
Draft Final Finding of Suitability For Early Transfer

Hamilton Army Airfield Main Airfield Parcel

Novato, California

Prepared for
Department of the Army



U.S. Army Corps of Engineers

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CH2MHILL

2485 Natomas Park Drive, Suite 600
Sacramento, California 95833

**DRAFT FINDING OF SUITABILITY FOR EARLY TRANSFER (FOSET)
WITH A CERCLA §120(h)(3) COVENANT DEFERRAL**

**HAMILTON ARMY AIRFIELD—MAIN AIRFIELD PARCEL
NOVATO, CA**

1.0 PURPOSE

The purpose of this FOSET is to document the environmental suitability of the proposed Main Airfield Parcel property at Hamilton Army Airfield for transfer to the City of Novato (City) and the California State Coastal Conservancy (Conservancy) consistent with the Department of Defense (DoD) policy and Section 334 of Public Law 104-201, amending the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) §120(h)(3)(C), as amended, of 42 U.S.C. 9620(h)(C), for the transfer of property prior to completion of all remedial actions. In addition, the FOSET identifies environmental factors associated with the proposed property transfer and demonstrates that the proposed property transfer prior to the completion of all remedial actions is consistent with the protection of human health and the environment, with the appropriate notifications and requirements to ensure that the wetland design for reuse is protective of future receptors.

Hamilton Army Airfield is a former Army and Air Force installation located approximately 22 miles north of San Francisco, California in Marin County. The facility was constructed on reclaimed tidal wetlands in 1932. The base historically provided full service support for fighter, bomber, and transport aircraft, training operations, and personnel. Hamilton Army Airfield was recommended for closure in 1988.

For purposes of convenience, The United States of America, acting by and through The Secretary of the Army, will be referred to as the Army throughout the document. For purposes of this document, the term “State of California (State)” shall mean the Department of Toxic Substances Control (DTSC) and/or the Regional Water Quality Control Board (RWQCB), where appropriate, and such other agency or instrumentality of the State as may have or as may acquire, by operation of law, regulatory jurisdiction concerning response actions.

This introduction has provided the background and purpose of the FOSET and presented a background on the property being addressed.
The remainder of this document is organized as follows:

Section 2—Provides a description of the property to be transferred

Section 3—Documents National Environmental Policy Act (NEPA) compliance

Section 4—Summarizes the environmental condition of the Property including Environmental Condition of Property Categories and a list of primary documents reviewed during the development of the FOSET

Section 5—Provides a description of any planned remedial or corrective actions, including the schedule for such actions

Section 6—Provides a description of the intended use of the Property and a determination of whether the anticipated reuse is reasonably expected to result in exposure to CERCLA hazardous substances

Section 7—Documents regulatory and public coordination and notification of the FOSET

Section 8—Provides assurances for the deed and for continuing environmental response actions and other actions to address remaining environmental contamination conditions at the Main Airfield Parcel following conveyance

Section 9—Documents the suitability for early transfer to the City and Conservancy

2.0 DESCRIPTION OF PROPERTY TO BE TRANSFERRED

The property proposed for transfer consists of the 644.19-acre Main Airfield Parcel property at Hamilton Army Airfield (the Property). This area includes the Inboard Area and portions of the Coastal Salt Marsh (CSM) currently owned by the Army (see **Enclosure 1**). The proposed reuse of the area is for a levee and for open space for the Hamilton Wetland Restoration Project as set forth in the Reuse Plan dated October 1995. The wetland reestablishment will be conducted by the Army Civil Works Program and the Conservancy. A site map showing the boundaries of the Property to be transferred is provided in **Enclosure 1**. A legal description of the Property to be transferred is provided in **Enclosure 2** (Legal Description of the Property). The Property is mostly grasslands with a runway, other taxiways, subsurface utilities, drainage features, and fifteen existing buildings or structures. A list of former structures and structures still present on the Property is provided in **Enclosure 3** (List of Buildings). Those structures that are present are proposed for transfer.

3.0 NEPA COMPLIANCE

NEPA requirements for this early transfer were satisfied by the analysis conducted in the Final Environmental Impact Statement, Hamilton Army Airfield Disposal and Reuse, dated December 1996, and the Record of Decision dated February 1997.

4.0 ENVIRONMENTAL CONDITION OF PROPERTY

A determination of the environmental condition of the property has been made based on the Environmental Baseline Survey dated June 2003 and the Community Environmental Response Facilitation Act (CERFA) Report dated 1994. The information provided is a result of a complete search of agency files during the development of these environmental documents.

The Army made a determination of the environmental condition of the Property by reviewing existing environmental documents and making associated visual site inspections. A complete list of the Property's supporting environmental condition documents is provided in **Enclosure 4** (Environmental Studies). Primary documents include:

1. Asbestos Survey for Hamilton Army Airfield by Occusafe, dated June 1989
2. Community Environmental Response Facilitation Act (CERFA) Report by Earth Technology Corporation, dated April 1994 and DTSC letters dated February 15, 2001; May 20, 1994; and April 18, 1994
3. Closure Report, Removal of PCB Transformers from Base Realignment and Closure (BRAC) Property by Remedial Constructors Inc., dated January 1996
4. Comprehensive Remedial Investigation Report by IT Corporation, dated April 1999
5. Remedial Design Investigation Report by Foster Wheeler, dated February 2000
6. Focused Feasibility Study (Inboard Area Sites) by CH2M HILL, dated August 2001
7. Focused Feasibility Study (Coastal Salt Marsh) by CH2M HILL, dated June 2003

8. Draft Final Record of Decision/Remedial Action Plan (ROD/RAP), Main Airfield Parcel, Army, DTSC, and RWQCB, dated May 2003
9. Final Human Health and Ecological Risk Assessment by the Army, dated August 2001
10. Completion Report, Asbestos Abatement at Hamilton Army Airfield by Roy F. Weston, Inc., dated July 2002
11. Final Environmental Baseline Survey, Main Airfield Parcel by CH2M HILL, dated June 2003

Based upon the results of previous investigations, the proposed early transfer of the Property to the City and Conservancy prior to the Army's completion of all necessary environmental remedial action, for use as open space for wetland reestablishment, is consistent with the intended reuse of the property and protection of human health and the environment. The early transfer will not substantially delay necessary response action required after the transfer of the Property to the City and Conservancy.

4.1 Environmental Condition of Property Categories

The DoD Environmental Condition of Property (ECP) categories were assigned to the areas of environmental concern within the Property using the above referenced documents. The ECP categories are defined as per **Enclosure 5** (ECP Categories). The ECP categories assigned to the Property proposed for transfer are as follows:

ECP Category 1: Northwest Runway Area¹ and Main Airfield Parcel (excluding other BRAC parcels listed separately)¹

ECP Category 2: Building 20, Building 26, East Levee Generator Pad, Onshore Fuel Line, Revetments 5, 8, 14, 15, 17, 20, 22, 24, 27, and 28, and Revetment 18/Building 15

ECP Category 3: Building 84/90 and Tarmac East of Outparcel A-5

ECP Category 4: Perimeter Drainage Ditch Spoil Pile E and H, and Revetments 9 and 10

ECP Category 5: Building 41 Area, Perimeter Drainage Ditch Spoil Pile F, Revetments 6 and 7

ECP Category 6: Former Sewage Treatment Plant (including sanitary and industrial waste lines), Building 35/39 Area, Building 82/87/92/94 Area (including storm drains), Building 86 (including storm drains), Perimeter Drainage Ditch, Perimeter Drainage Ditch Spoil Piles A, B, C, D, G, I, J, K, L, and M, Revetments 1, 2, 3, 4, 11, 12, 13, 16, 19, 21, 23, 25, and 26, Former Revetments, High Marsh Area—proposed channel cut area, High Marsh Area—nonchannel cut, Outfall Drainage Ditch, Historical Outfall Drainage Ditch, Antenna Debris Disposal Area, East Levee Construction Debris Disposal Area, Area 14, Boat Dock—channel area, and Boat Dock—nonchannel Area, Northwest

¹ The Army does not view the Inboard Area-Wide DDTs and PAHs adjacent to the runway as a release that is actionable under CERCLA and therefore considers the parcel to be a Category 1. DTSC does view the Inboard Area-Wide DDTs and PAHs adjacent to the runway as a CERCLA release and considers the parcel to be a Category 6. The ROD/RAP addresses this issue to everyone's satisfaction, and it is anticipated that the deferred CERCLA warranty is expected to be issued in the future for the whole Property.

Runway Area¹, and Main Airfield Parcel (excluding other BRAC parcels listed separately)¹

ECP Category 7: Testing Range, Northwest Alleged Disposal Area, Skeet Range, and Firing-In-Butt

4.2 Hazardous Substance Storage, Release, or Disposal

Areas in categories 1–6 where hazardous substances were known or suspected of having been stored, released, or disposed of were investigated during environmental investigations at Hamilton. The following areas are identified as having releases or potential releases of hazardous substances: Former Sewage Treatment Plant (including sanitary sewer lines); Building 35/39 Area; Building 82/87/92/94 Area (including storm drains); Building 84/90; Building 86 (including storm drains); Perimeter Drainage Ditch; Perimeter Drainage Ditch Spoil Piles A, B, C, D, E, F, G, H, I, J, K, L, M; Revetments 1, 2, 3, 4, 6, 7, 9, 10, 11, 12, 13, 16, 19, 21, 23, 25, and 26 (including storm drains); Former Revetments; High Marsh Area—proposed channel cut area; High Marsh Area—nonchannel cut area; Historical Outfall Drainage Ditch; Outfall Drainage Ditch; Antenna Debris Disposal Area; Boat Dock—channel area, and the Boat Dock—nonchannel area. Details regarding the releases and necessary remedial actions, if any, are summarized in **Enclosure 6** (Notice of Hazardous Substance and Petroleum Product Storage, Release or Disposal). DTSC also views the Inboard Area-Wide DDTs and PAHs near the runway as a CERCLA release of hazardous substances. The Army does not view the Inboard Area-Wide DDTs and PAHs near the runway as releases that are actionable under CERCLA.

PCBs were detected within the Inboard Area in soils at the following locations: former sludge drying bed area of the Former Sewage Treatment Plant, Perimeter Drainage Ditch, Building 92/94 Transformer Pad, Building 82 Transformer Pad, Boat Dock Transformer Pad, and East Levee Generator/Pad. The releases were addressed through Remedial Investigation and the Interim Removal Action activities and confirmation sampling confirmed PCBs were no longer present at these sites. Within the Coastal Salt Marsh, PCBs have been detected at the Antenna Debris Disposal Area. This site is currently under investigation, and the proposed remedial decision for the site is documented in the ROD/RAP.

The Property deed will include a PCB notification provided in the Environmental Response Obligation Addendum (EROA) (**Enclosure 7** – Environmental Response Obligation Addendum).

For the purposes of this FOSET, when the dates and quantities of material stored, released, or disposed are not known, the amount of stored material is assumed to be greater than the reportable quantity. The type of hazardous substances potentially stored, released, or disposed is based upon historical use of the site. **Enclosure 6** summarizes the status of all buildings and structures included in this FOSET in which hazardous substance releases have occurred, and the buildings and structures where actions are still pending.

As noted in Subsection 4.1 above, sites identified under ECP Categories 5, 6, and 7 are sites where additional actions are needed after the Property is transferred. Remedial decisions for all of the sites are documented in the ROD/RAP.

4.3 Petroleum and Petroleum Products

4.3.1 Underground and Above-Ground Storage Tanks (UST/AST) Storage, Release or Disposal of Petroleum Products

This subsection identifies areas where petroleum had been released into the environment. **Enclosure 6** summarizes the status of these areas. Completed and ongoing actions are documented in the ROD/RAP.

Areas where petroleum products were known or suspected of having been stored, released, or disposed of from USTs/ASTs were investigated during the various environmental investigations at Hamilton. The following areas are identified as having releases or potential releases of petroleum products: Building 20, Building 26, Building 35/39 Area, Building 41 Area, East Levee Generator Pad, and Revetment 18/Building 15. Details regarding the release and response actions, if any, are summarized in **Enclosure 6**.

4.3.2 Non-UST/AST Storage, Release, or Disposal of Petroleum Products

Petroleum products were known or suspected of having been released or disposed of from petroleum related activities that were conducted in and around the following areas: Building 82/87/92/94 Area, Building 84/90, Building 86, Onshore Fuel Line (54-inch diameter Drain Line Segment, Hangar Segment, Northern Segment), Tarmac East of Outparcel A-5, and Revetments 5, 8, 14, 15, 17, 20, 22, 24, 27, and 28. A summary of Non-UST/AST petroleum and petroleum products storage, release, and disposal within buildings or areas on the Property is provided in **Enclosure 6**.

4.4 Groundwater Contamination

Isolated detections of contaminants were identified in groundwater at the following areas: Former Sewage Treatment Plant, Building 20, Building 35/39 Area, Building 41 Area, Building 82/87/92/94 Area, Building 84/90, Building 86, Northwest Runway Area, Revetments 5, 6, 9, 10, and 12, and Revetment 18/Building 15 Area. Removal actions were conducted at some locations, e.g., Former Sewage Treatment Plant, coincident with impacts to groundwater. The isolated detections at these sites did not indicate the presence of a larger groundwater contamination problem.

The Army conducted an additional groundwater investigation at Building 82 in September 2002. Groundwater samples were collected and analyzed for total petroleum hydrocarbon constituents and benzene, toluene, ethylbenzene, xylene (BTEX). Total petroleum hydrocarbons measured as diesel, gasoline, and motor oil were detected in the groundwater samples. Total petroleum hydrocarbons measured as diesel was detected in all six groundwater samples at concentrations ranging from 0.52 to 1.9 milligrams per liter, total petroleum hydrocarbons measured as gasoline was detected in one sample at a concentration of 0.19 milligrams per liter, and total petroleum hydrocarbons measured as motor oil was detected in five samples at concentrations ranging from non-detect to 1.4 milligrams per liter. Benzene, toluene, ethylbenzene, xylene (BTEX) compounds were not detected in the groundwater samples. Levels of total petroleum hydrocarbons were within the levels established for the Saltwater Ecological Protection Zone derived at the Presidio and applied at Hamilton Army Airfield.

Prior to being abandoned and destroyed, 17 monitoring wells located in the Main Airfield

Parcel and adjacent marsh were sampled by the Army in December 2001 and January 2002. These data were collected mainly because little dissolved metals data were collected during previous sampling efforts and to supplement existing monitoring data. Organic constituents that were reported in groundwater appear to be distributed randomly at relatively low concentrations and are below Regional Water Quality Control Board risk-based screening levels (RWQCB, 2001). Dissolved metals concentrations for some wells exceeded salt water aquatic life protection numbers for copper, zinc and nickel and may be due to site geology; background wells also had exceedances. The magnitude of the exceedances appeared to be significant for nickel only, which occurs commonly in San Francisco Bay geologic formations, i.e., Franciscan Group.

In addition, a monitoring well (JFL-MW-1) located near the 90-degree bend in the Onshore Fuel Line 54-inch diameter Drain Line Segment was sampled in August 2002. Total petroleum hydrocarbons measured as diesel was the only contaminant detected in the groundwater.

It was determined that no further action is required to address groundwater impacts at Hamilton Army Airfield.

In general, groundwater elevations in the Main Airfield Parcel range between 1 foot below ground surface (bgs) to 10 feet bgs. Groundwater gradients vary from about 0.0 beneath the revetment area to 0.051 near the Pump Station Area. Overall, groundwater surface is primarily horizontal and generally mimics the topography. Tidal influence on groundwater surface was observed in the Former Sewage Treatment Plant well, TP-MW-101, but not in the Pump Station Area well, PS-MW-101. These wells are immediately inboard of the perimeter levees.

Groundwater beneath the Property is not now, nor is it likely to be, used for drinking water. Current drinking water is provided by a municipal drinking water system. State Water Resources Control Board Policy 88-63 (1988) specifies the criteria for determining whether groundwater is a source of drinking water, that is, if it is suitable for municipal or domestic water supply. One of the criteria for suitability as drinking water is low total dissolved solids. The policy defines water with total dissolved solids in excess of 3,000 mg/L as unsuitable for drinking. The total dissolved solid concentrations in groundwater from monitoring wells across the Property range from 819 to 18,270 mg/L. These findings indicate that groundwater beneath the Hamilton Army Airfield Main Airfield Parcel and adjacent marsh is generally unsuitable for drinking because the average total dissolved solid concentration of 4,890 mg/L exceeds the 3,000 mg/L limit. In addition, the groundwater is not likely a source of industrial groundwater because of its very low sustainable yield in the impermeable Bay Mud.

There are 11 supply wells located within a 2-mile radius of Hamilton Army Airfield, and 1 well is located within 1 mile of the site boundary. The majority of the wells are used for domestic or irrigation supply, and wells appear to be outside the influence of historical Hamilton Army Airfield activities.

4.5 Polychlorinated Biphenyls (PCBs) Equipment

There are no PCB-containing transformers located on the Property. The transformers located at the Building 35/39 Area contain non-PCB liquid (coolant fluid). Within the Inboard

Area, an additional electrical vault was identified, but PCBs were not detected at actionable levels.

4.6 Lead-Based Paint (LBP)

Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. The Property does not contain any residential housing and is not to be used for housing, schools, playgrounds, childcare and daycare facilities, or other facilities posing a similar lead poisoning risk to children under the age of 6.

Based on the Lead-Based Paint Poisoning Prevention Act and the Residential Lead-Based Paint Hazard Reduction Act, no Lead-Based-Paint testing was conducted on the property. However, based upon the age of the buildings (constructed prior to 1978), all buildings listed in **Enclosure 3** are presumed to contain lead-based paint or to have contained LBP prior to demolition.

To address possible lead contamination due to lead-based paint at current and previously demolished building locations, the Hamilton Wetland Restoration Project will provide 3 feet of stable cover over the footprint of the building and to a distance of 6 feet beyond the building footprint. If this 3 feet of cover can not be achieved, the soil at these current and previously demolished building locations plus 6 feet beyond the building perimeter will be scraped to a depth of 6 inches and managed elsewhere on-site beneath 3 feet of stable cover. The building foundation and any concrete/asphalt/hard foundation surface adjacent to the building may remain. Standard lead abatement practices will be followed during construction activities.

The disclosure of conditions will be included in the transfer agreement. The deed will include the lead-based paint notification and covenant provided in the EROA (**Enclosure 7**).

4.7 Asbestos

All asbestos, non-friable and friable, or asbestos containing material (ACM) have been removed by the Army from the Property with the exception of the asbestos pipe covering remaining on a small segment of outfall pipes that have been left in place within the levee at Buildings 35 and 39. The ACM on the Property does not currently pose a threat to human health or the environment. All friable asbestos that posed a risk to human health has been removed. If the Conservancy demolishes or removes Buildings 35 and 39, the Conservancy will address the asbestos pipe covering remaining on the small segment of outfall pipes that have been left in place within the levee at Building 35 and 39.

The deed will include the asbestos notification provided in the EROA (**Enclosure 7**).

4.8 Radiological

Within the Main Airfield Parcel, just south of the northern levee beyond the runway overrun, two corrugated metal culverts containing electron tubes and waveguides were previously located. In 1988, the cylinders were recovered and the low-level radioactive material was removed from the Main Airfield Parcel and properly disposed of. The Department of Health Services indicated the site is suitable for unrestricted use, with respect to radionuclides.

Radiological surveys were conducted on the Property at Building 86 because radioactive commodities were reportedly used or stored in that building. The Army Environmental Hygiene Agency completed a thorough review of Army records in regard to radiological materials. Telephone interviews were conducted with several representatives of the Army. A review of the survey results indicated that there were no radiological health hazards identified as a result of the use and storage of radioactive commodities in the building. Building 86 was released for unrestricted use. No other records pertaining to the use, storage, or disposal of radiological materials at Hamilton Army Airfield were identified.

4.9 Radon

A radon survey has not been conducted on the Hamilton Army Airfield, Main Airfield Parcel. The CERFA Report indicates interviews with the Environmental Investigation contractor, a review of applicable environmental documents, and adjacent property radon survey results indicate that radon is not a concern at Hamilton Army Airfield. Test data and survey results for the adjacent Navy property (housing) indicated radon below the U.S. Environmental Protection Agency (USEPA) recommended action levels. Information provided by U.S. Geologic Survey representatives indicate that radon is not found in the region because of the geology of the area. Therefore, the CERFA Report concluded radon is not considered to be an environmental concern at Hamilton Army Airfield.

4.10 Ordnance and Explosives

The Archive Search Report identified potential Ordnance and Explosives (OE) related features, including an aircraft harmonization range, a skeet range, black powder and demolition bombs storage magazines, firing-in-butt, and a “testing” range (which included a firing range). Of these features, only the demolition bombs storage magazine was identified as a potential source of OE contamination due to possible disposal of unserviceable bombs by burial. The demolition bombs storage magazine was demolished and the area was paved over during the extension of the runway circa 1953. The harmonization range was subsequently identified as an aircraft avionics shop. The other range facilities would have employed small arms which would not pose an explosive hazard. In conducting the archives search and the site inspection, no indications or evidence of OE contamination were found at these facilities. The ROD/RAP proposes future investigations to address potential releases of contamination at the Skeet Range, Firing-in-Butt, and the Testing Range.

The deed will include ordnance and explosives notification provided in the EROA (**Enclosure 7**), which also includes requirements for proper notification of authorities in the event that ordnance and explosives are discovered after transfer of the Property. One other requirement is that a Soil Management Plan be submitted before intrusive activities occur on the Property. This plan will be used to provide oversight over intrusive activities in potential ordnance and explosives areas.

4.11 Other Environmental Conditions

Adjacent properties include Landfill 26, Navy MTBE plumes, POL Hill, and the North Antenna Field. The currently available data indicate that these sites are not adversely impacting

the Main Airfield Parcel. Stormwater runoff from these sites is handled, collected, and transported across the Main Airfield Parcel.

Title 27 requires protective measures to ensure structures within 1,000 feet of a landfill disposal site are not adversely impacted by potential migration of landfill gases. Some portion of the Main Airfield Parcel may be within 1,000 feet of Landfill 26.

4.11.1 Residual Inboard Area-Wide Dichlorodiphenyltrichloroethane (DDTs) and Polynuclear Aromatic Hydrocarbons (PAHs)

Several additional issues related to DDTs (DDT, and its breakdown products DDE and DDD) and PAH contamination have been identified within the Inboard Area of the Main Airfield Parcel. These issues include PAHs in soil near the runway and residual Inboard Area-Wide DDTs. The Army has identified these issues as not being CERCLA releases and therefore does not address them in the comprehensive remedial investigation, interim removal actions, human health and ecological risk assessment, or the Focused Feasibility Study for the Inboard Area Sites. DTSC and RWQCB consider the DDT and PAH contamination to be subject to the California Health and Safety Code, which requires the ROD/RAP to be consistent with the NCP. The Army has agreed with the regulatory agencies to address these issues in the ROD/RAP for the Main Airfield Parcel.

4.11.2 General Services Administration (GSA) and BRAC Soil Stockpiles

Approximately 97 soil stockpiles are currently staged in rows on the runway. The GSA and BRAC closure activities on previously transferred portions of Hamilton generated the soil. The soil has been staged on the runway located on the Main Airfield Parcel. Only soil with contamination below hazardous concentrations as defined by CERCLA, or soil not regulated by CERCLA, was stockpiled. Soil not regulated by CERCLA includes soil from total petroleum hydrocarbons (TPH) sites. Soil with concentrations above CERCLA hazardous waste thresholds, such as for lead, PCBs, volatile organic compounds, pesticides, or herbicides were not stockpiled on the runway and were shipped offsite for disposal.

The stockpiles have been managed to prevent erosion and sediment transport by rainwater runoff. Each pile has been coated with a soil cement mixture to prevent erosion and constructing soil and/or straw berms to prevent sediment transport. The State will determine what additional actions (if any) may be required with respect to the stockpiled soil. This issue is being addressed in the ROD/RAP for the Main Airfield Parcel.

5.0 RESPONSE ACTION AND OPERATION AND MAINTENANCE REQUIREMENTS

Projected Schedule for Remedial Action

The RWQCB, as authorized by the Porter Cologne Water Quality Control Act, will adopt site cleanup requirements that will ensure implementation of the final approved ROD/RAP requirements. Through these Site Cleanup Requirements, the RWQCB will ensure that agreed-upon environmental assurance actions are taken to address residual concentrations of Inboard Area-Wide DDTs and PAHs in soils adjacent to the runway through the imposition of Waste

Discharge Requirements governing the implementation of the Hamilton Wetland Restoration Project.

The Army shall ensure that the Hamilton Wetland Restoration Project, including implementation of its plan for monitoring and adaptive management, will achieve and maintain the performance criteria throughout the life of the wetland at each site where it is applied. The duration of the Hamilton Wetland Restoration Project obligation shall extend to a date 13 years following the date of levee breach and reintroduction of tidal influence to the Inboard Area. Throughout the period of implementation of the Hamilton Wetland Restoration Project and after, the Army and the property owner shall ensure that the remedy for these sites is maintained to the extent necessary to protect human health and the environment (i.e., 5-year reviews).

Activities in the coastal salt marsh will be conducted in a manner that is sensitive to impacts to plants and animals. The excavated areas in the coastal salt marsh will be backfilled with either clean onsite soil or rehandled dredged material of similar physical characteristics, except in the area proposed as a channel cut by the Hamilton Wetland Restoration Project. A Soils Management Plan will be submitted to support the oversight of these intrusive activities.

Several areas of the HAAF property are still under investigation to determine the final activities necessary for protection of the wetlands reuse. The BRAC and GSA soil stockpiles that were generated from previous excavation activities are currently located on paved surfaces. These areas include the following sites identified in the Archive Search Report:

- Testing Range (ASR Site #4)
- Alleged HTRW Disposal Site (ASR Site #8)
- Skeet Range (ASR Site #18)
- Firing-In-Butt (ASR Site #19)

The RWQCB, through its Site Cleanup Requirements, will detail the process for further investigation and remediation (if needed) of these areas. If remediation is required, the action goals established in this ROD/RAP will apply. All required Army activities must be completed according to a schedule that does not interfere with the progress of the Hamilton Wetland Restoration Project.

A schedule for the activities described above is provided in **Enclosure 9**.

6.0 ANALYSIS OF FUTURE LAND USE

The Army is transferring approximately 630 acres of the Main Airfield Parcel to the Conservancy to become part of the Hamilton Wetland Restoration Project. The remaining approximately 14 acres will be transferred to the City of Novato and is the footprint for the existing New Hamilton Partners levee. The ROD/RAP presents the environmental actions to be conducted by the Army necessary to protect public health and the environment based on the proposed future use of the property for wetland reestablishment. The Hamilton Reuse Plan designates the Main Airfield Parcel as open space for wildlife habitat restoration and wetland restoration use. The intended use of the Property is unanticipated to result in exposure to CERCLA hazardous substances that would pose unacceptable risk to human health and the environment.

The environmental impacts associated with the proposed transfer of the Property have been analyzed in accordance with the NEPA. The results of this analysis have been documented in the Final Environmental Impact Statement, Hamilton Army Airfield Disposal and Reuse, dated December 1996, and the Record of Decision dated February 1997. Any encumbrances or conditions identified in such analysis as necessary to protect human health or the environment have been incorporated into the FOSET. In addition, the proposed transfer is consistent with the intended reuse of the Property as set forth in the Hamilton Army Airfield Reuse Plan (1995).

7.0 REGULATORY/PUBLIC COORDINATION OR NOTIFICATION AND RESPONSIVENESS SUMMARY

The State was notified of the initiation of the FOSET. The Draft Final FOSET dated June 2003 was reviewed by the State and comments have been incorporated.

The Army provided public notice of its contemplated use of the Early Transfer Authority and its intent to request approval of a covenant deferral by publishing a notice in local newspapers on May 28 and June 1, 2003. The State will be provided a thirty (30) day formal comment period on the Draft Final FOSET concurrently with the public comment period starting June 5, 2003. During the public comment period, the Army invites comments from the public and regulatory agencies on the Draft Final FOSET. A public meeting will be held on June 16, 2003. The comments received and the Army's responses to these comments will be attached as **Enclosure 8** (Response to Comments Summary) and will be incorporated into this document where appropriate.

8.0 RESPONSE ACTION ASSURANCES

As part of the early transfer, CERCLA §120(h)(3)(C)(ii) requires that the deed or other agreement shall contain the following assurances:

1. Provide for any necessary covenants/restrictions on the use of the property to ensure the protection of human health and the environment.
2. Provide that there will be covenants/restrictions on use as necessary to ensure that required investigations, response actions, and oversight activities will not be disrupted.
3. Provide that all necessary response actions will be taken, and identify the schedules for investigation and completion of all necessary response actions, as approved by the appropriate regulatory agency.
4. Provide that the federal agency responsible for the property subject to transfer will submit a budget request to the Director of the Office of Management and Budget that adequately addresses schedules for the investigation and completion of all necessary response actions, subject to congressional authorizations and appropriations.

Assurances for continuing environmental response actions and other actions to address remaining environmental contamination conditions at Hamilton Army Airfield following conveyance will be provided by the following:

1. The Army and the State have cooperatively developed the ROD/RAP for the Main Airfield Parcel in accordance with the requirements of CERCLA and the National Oil and Hazardous Substance Contingency Plan (NCP), Chapter 6.8 of Division 20 of the California Health and Safety Code, and Section 25356.1 and Chapter 5 of Division 7 of

the California Water Code. The RWQCB, with Department of Toxic Substance Control support, will be the lead state agency for oversight of the implementation of the ROD/RAP. The RWQCB, as authorized by the Porter Cologne Water Quality Control Act, will adopt Site Cleanup Requirements that will ensure implementation of the final approved ROD/RAP. The ROD/RAP specifies actions, including appropriate land use restrictions, to be taken to remediate and otherwise address contaminants on the Property and to ensure the suitability of the Property for subsequent use as wetlands. The Army is responsible for ensuring all actions required by the ROD/RAP are implemented.

2. The RWQCB will issue site cleanup requirements pursuant to Section 13304 of the California Water Code, which are acceptable to the Army, to require implementation of the ROD/RAP. The RWQCB will also issue waste discharge requirements in connection with implementation of the Hamilton Wetland Restoration Project regarding the placement and monitoring of cover material on the Main Airfield Parcel sites in accordance with performance criteria specified in the ROD/RAP. The RWQCB, through its Executive Officer, has primary responsibility for reviewing all documentation and determining whether remedial actions taken in conjunction with the ROD/RAP at Hamilton Army Airfield are complete and satisfy the site cleanup requirements.
3. An Implementation Memorandum of Agreement (MOA) will be entered into by the Army and the Conservancy. This MOA outlines roles and responsibilities for the Army BRAC Program, the Army Civil Works Program, and the Conservancy for the implementation of the ROD/RAP requirements.
4. A land use covenant will be entered into by the Army and State to address the following requirements:
 - a) Grading, excavation, and intrusive activities must be conducted pursuant to a plan approved by the State.
 - b) The property shall not be used for residences, schools, daycare facilities, hospitals, hospices, or similar sensitive uses.
 - c) State and federal agencies must have access to the property. The property owner shall provide access, on an as-needed basis, minimizing any interference with the implementation, operation, or maintenance of the ecosystem restoration project. Appropriate federal and state agencies and their officers, agents, employees, contractors, and subcontractors will have the right, upon reasonable notice, to enter the property when it is necessary to carry out response actions or other activities consistent with the purposes of this ROD/RAP. Appropriate federal and state agencies and their officers, agents, employees, contractors, and subcontractors will also have the right, upon reasonable notice, to enter adjoining property, when it is necessary to carry out response actions or other activities consistent with the purposes of this ROD/RAP.

8.1 Deferred Warranty

Upon State concurrence with the Army's determination that all response action necessary to protect human health and the environment with respect to any substance remaining on the property on the date of transfer has been taken, the Army shall execute and deliver to the transferee an appropriate document containing a warranty that all such response action has been taken, and the making of the warranty shall be considered to satisfy the requirement of CERCLA

§120(h)(3)(A)(ii)(I). This warranty shall be in a form that is recordable in the Office of the Recorder, Marin County, California.

8.2 Budgeting for Response Actions

The Army has submitted and will continue to submit through its established budget channels to the Director of the Office of Management and Budget a request for funds that adequately addresses investigation and completion of all response actions required. Expenditure of any Federal funds for such investigations or response actions is subject to congressional authorization and appropriation of funds for that purpose, and nothing herein shall be interpreted to require obligations or payments by the United States in violation of the Anti-Deficiency Act. The Army will submit its funding request for the projects needed to meet the necessary response actions.

All correspondence regarding these projects will recite that these projects are being undertaken on property being transferred pursuant to CERCLA §120(h)(3)(C) and that once validated, approved, and funded, the funding may not be withdrawn without the consent of the Assistant Secretary of the Army for Installations and Environment.

9.0 FINDING OF SUITABILITY FOR EARLY TRANSFER

CERCLA §120(h)(3)(A)(ii)(I) requires that a covenant indicating that all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the property has been taken prior to transfer by deed. The deferral of the covenant for this property has been adequately assessed and evaluated to assure that (a) the transfer will not delay environmental response actions, (b) the reuse of the property will not pose a risk to human health or the environment, and (c) the federal government's obligation to perform all necessary response actions will not be affected by the early transfer of this property. The property is therefore suitable for early transfer to the City and Conservancy.

The Army will submit a request that the required covenant of CERCLA §120(h)(3)(A)(ii)(I) be deferred for this property, to the Governor of the State of California, for concurrence. The covenant required by CERCLA §120(h)(3)(A)(ii)(I) will be included with the deed. The City and Conservancy will receive a warranty authorized under CERCLA §120(h)(3)(C)(iii) when all response actions have been taken in accordance with the provisions of the ROD/RAP. Transfer of property cannot occur until the Governor of the State of California has provided concurrence.

Based on the above information, I conclude that all Department of Defense requirements to reach a finding of suitability for early transfer of the Main Airfield Parcel at Hamilton Army Airfield to the Conservancy and to the City of Novato for the intended reuse as open space for wetland reestablishment and levee footprint have been met for the Property. In addition, all Department of Defense requirements to reach a finding of suitability for early transfer have been met subject to the terms and conditions set forth in the attached Environmental Response Obligation Addendum, which shall be included in the deed for the Property. The Environmental Response Obligation Addendum also includes the CERCLA §120(h)(3)(C) covenant and access provisions. Finally, the hazardous substance notification (**Enclosure 6**) shall be included in the deed as required under the CERCLA §120(h)(C) and DoD Guidance.

Date

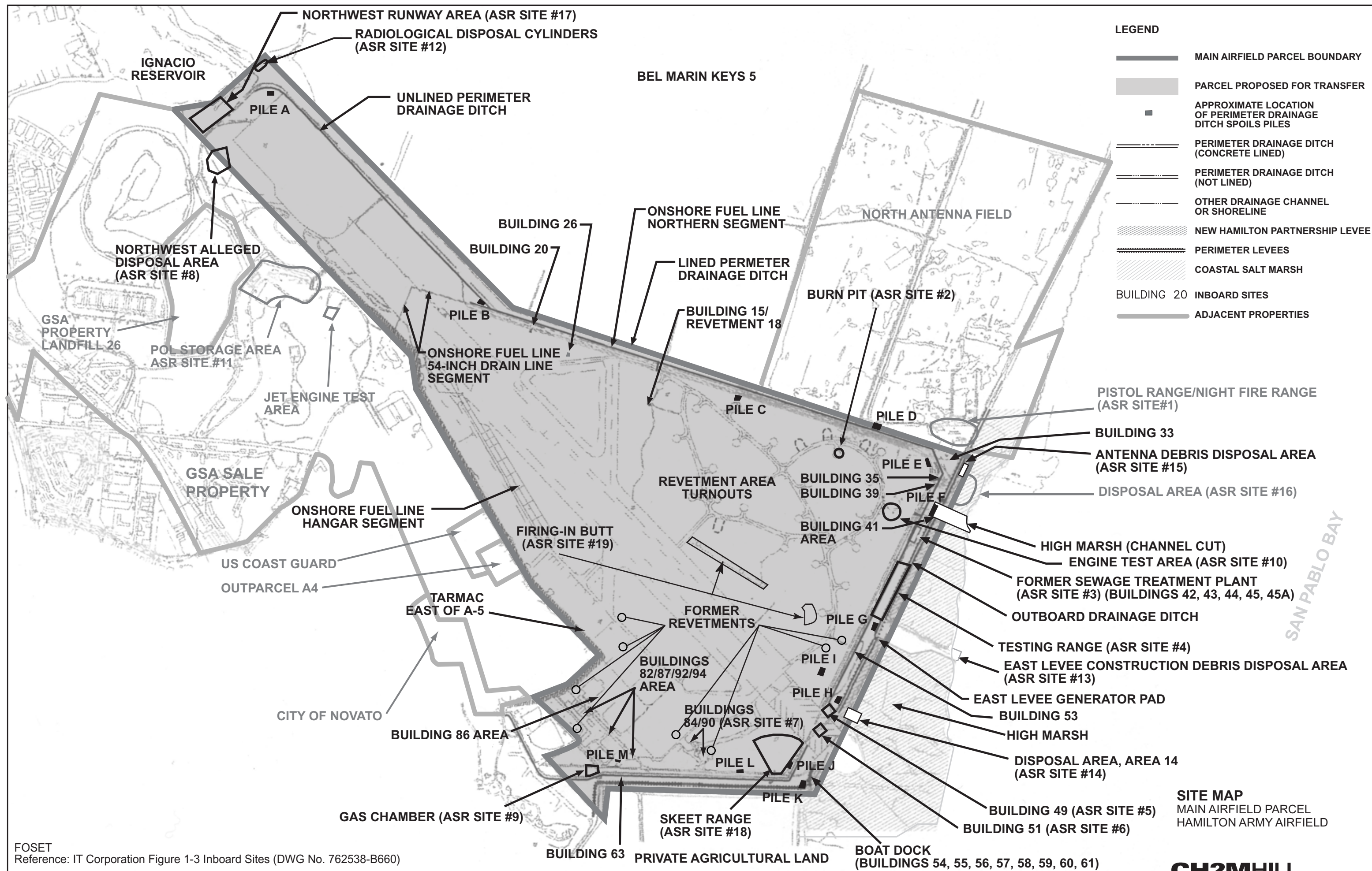
Raymond J. Fatz
Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)
OASA (Installation and Environment)

Enclosures

1. Site Map
2. Legal Description of the Property
3. List of Buildings and Structures
4. Environmental Studies
5. Environmental Condition of Property (ECP) Categories
6. Notice of Hazardous Substances and Petroleum Product Storage, Release, or Disposal
7. Environmental Response Obligation Addendum (EROA)
8. Response to Comments Summary
9. Approximate Schedule of Cleanup Activities for Hamilton

ENCLOSURE 1

Site Map



FOSET
Reference: IT Corporation Figure 1-3 Inboard Sites (DWG No. 762538-B660)

ENCLOSURE 2

Legal Description of the Property

Revised: September 5, 1996
Date: July 9, 1996
File: 8-410-040

DESCRIPTION
644.187 ACRE U.S. ARMY PARCEL
AT
HAMILTON ARMY AIRFIELD

1. Beginning at a concrete monument and 4" brass disc marked "Property of the United States", located at the intersection of the calls "West 3398.58" and "South 154.66" as described in the Quitclaim deed from the State of California to the United States of America recorded January 17, 1985 under Document No. 85-002142, Marin County records, said point of intersection having California State Plane Zone III coordinates of X=1,422,499.81 feet and Y=569,791.84 feet;
2. Thence along the general southerly line of said Quitclaim deed, South 01°18'38" West 353.29 feet to a concrete monument and 4" brass disc marked "Property of the United States";
3. Thence leaving said line, and along the easterly line of the property transferred to the Department of the Navy from the Department of the Air Force by memorandums for the Secretary of the Navy, dated January 25, 1975, and May 5, 1976, North 43°30'48" West 1,014.69 feet;
4. Thence North 59°16'12" East 413.65 feet to a 1 inch iron pipe;
5. Thence North 43°40'14" West 714.70 feet;
6. Thence leaving said line of the property transferred to the Department of the Navy, North 82°27'41" East 49.96 feet;
7. Thence North 66°16'26" East 411.96 feet;
8. Thence North 46°17'38" East 452.40 feet;
9. Thence North 43°40'36" West 375.28 feet;
10. Thence North 43°39'16" West 422.90 feet;
11. Thence North 43°42'20" West 395.83 feet;

Continued

12. Thence North 29°55'44" West 444.45 feet to the general easterly line of the Parcel conveyed to the U. S. Coast Guard July 10, 1984;
13. Thence along said easterly line, North 30°05'00" West 506.00 feet to the easterly line of the Parcel described in the Quitclaim deed to New Hamilton Partnership as Exhibit "A", Tract 1, recorded January 26, 1995 under Document No. 95-029154, Marin County Records;
14. Thence along said easterly line North 59°55'00" East 1.32 feet;
15. Thence North 29°56'04" West 1,681.44 feet;
16. Thence North 09°24'21" West 418.20 feet;
17. Thence North 43°38'33" West 4,053.33 feet to the northwesterly line of aforementioned Quitclaim Deed to the United States of America Parcel (Document No. 85-002142);
18. Thence along the line of said Quitclaim deed North 82°59'01" East 528.25 feet;
19. Thence North 46°22'09" East 801.67 feet;
20. Thence South 43°37'51" East 4,141.23 feet;
21. Thence South 72°25'02" East 5,675.22 feet to the northwest corner of Parcel 4 of the Quitclaim deed from the United States of America to the State of California recorded January 17, 1985 under Document No. 85-002144, Marin County Records;
22. Thence along the line of said Parcel 4, South 17°34'58" West 15.00 feet;
23. Thence South 72°25'02" East 106.68 feet to the easterly line of the property described in the Quitclaim deed from the State of California to the United States of America recorded January 17, 1985, under Document No. 85-002142, Marin County Records (reference exception on Page 8);
24. Thence leaving said line of Parcel 4, and along the easterly and southerly lines of said Quitclaim deed (Document No. 85-002142), South 26°11'58" West 4,356.27 feet;
25. Thence South 00°42'02" East 92.81 feet;
26. Thence North 88°41'22" West 2,453.15 feet to the POINT OF BEGINNING.

ENCLOSURE 3

List of Buildings and Structures

ENCLOSURE 3
List of Buildings and Structures

Building	Year Built	Area (ft ²)	Historical Use	Current Status
Building 15	<1978 ^e	365 ^c	Radar Building (TACAN) ^d	Present
Building 16	<1978	NA	Shack located on Revetment 20	Demolished
Building 20	1957 ^f	140 ⁱ	Generator Building ^d	Present
Building 26	<1978 ^e	1,536 ^c	Ground Approach Radar Building (A 1,000-gallon underground diesel storage tank was removed from the west end of this building. The tank fed a power generator.) ^a	Present
Building 35	<1940	492 ^c	Secondary stormwater pump station (An aboveground diesel storage tanks was associated with this building.) ^a	Present
Building 38 (Building 53)	<1940	NA	Generator to power pump stations ^a	Present
Building 39 (Building 59)	<1940 <1952	489 ^c	Automatic pump station (Aboveground diesel storage tank next to this building was removed.) ^a	Present
Building 40	<1978 ^e	NA	Generator to power pump stations (aboveground storage tank next to this building) ^a	Demolished
Building 41	<1978 ^e	2,454 ^c	Stormwater pump station. ^a Contains four diesel powered pumps for water removal.	Demolished
Building 42	<1978 ^e	550 ^c	Former sewage treatment facility ^a	Demolished ^{a,g}
Building 43	<1978 ^e	733 ^c	Former sewage treatment facility ^a	Demolished ^{a,g}
Building 44	<1978 ^e	151 ^c	Former sewage treatment facility ^a	Demolished ^{a,g}
Building 45	<1978 ^e	1,012 ^c	Former sewage treatment facility ^a	Demolished ^{a,g}
Building 45 A	<1978 ^f	NA	Former sewage treatment facility	Demolished
Building 46	<1978	NA	Storage for engine test stand at Revetment 6	Demolished
Building 47	<1940	NA	Storage shed at testing range	Demolished
Building 48	<1978 ^e	300 ^c	Former Generator Building near the firing-in-butt ^d	Present ^h
Building 49	1934 ⁱ	706 ⁱ	Black powder magazine	Demolished
Building 51	1934 ⁱ	813 ⁱ	Demolition bombs magazine	Demolished
Building 53	<1945	NA	AAA Barracks	Demolished
Building 54	<1945	NA	Storehouse	Demolished
Building 55	<1945	NA	Supply	Demolished
Building 56	<1945	NA	Lumber Storehouse	Demolished
Building 57	<1978 ^e	3,060 ^j	Barracks and bathhouse ^j	Demolished
Building 58	<1952	450 lineal feet ⁱ	Wharf and Bulkhead ^j . Structure located near the southeast corner of the Main Airfield Parcel as part of the Boat Dock complex, designating the dock and associated turning basin.	Present
Building 59	<1945	NA	Mess Hall	Demolished
Building 60	<1978 ^e	651 ^j	Boathouse ^j	Demolished
Building 61	<1945	NA	Boat House Paint Shop	Demolished
Building 63	<1945	NA	AAA Barracks	Demolished

ENCLOSURE 3
List of Buildings and Structures

Building	Year Built	Area (ft ²)	Historical Use	Current Status
Building 65	1942	NA	Former gas chamber located in the southwest area of the Main Airfield Parcel between the Perimeter Drainage Ditch and Perimeter Road	Demolished
Building 82	1969 ^f	14,960 ^c	Storage of MEDEVAC supplies (previously authorized to store war-ready materials). ^a Aircraft rescue and first aid. ^g	Present
Building 83	<1978 ^e	121 ^c	Oxygen storage shed ^f	Present
Building 84	1961 ^b	12,132 ^c	Used by the 12 th Special Forces of the 4 th Army for training (entry denied). ^a Reportedly used for electronics equipment repair. ^b	Present
Building 86	1967 ^f	68,797 ^k	Storage and light maintenance area for aircraft with classrooms on the third floor. ^a Storage Area 2 on southwest corner of building (maintenance related fluids). Storage Area 1 on northeast corner for drums. Building surrounded by concrete aircraft aprons. ^g	Demolished
Building 87	<1978 ^e	464 ^c	Storage area for unopened chemical containers (oil, grease, antifreeze, solvent, paint, etc). 55-gal drums and CONEX outside. Drums contained PD-680, aircraft cleaning compound, or turbine engine cleaner. CONEX contained cans of gasoline. ^a	Present ^g
Building 88	<1978 ^e	NA	Unknown	Demolished
Building 90	1961 ^b	2,986 ^c	Aircraft avionics shop ^b	Present
Building 91	<1978	NA	Requisition/Quartermaster supply	Demolished
Building 92	1972 ^f	4,000 ^c	Crash/rescue station with fire truck (had some compressed gas cylinders and small drums of purple K). ^a Currently used for storage of supplies and records. ^g	Present ^g
Building 93	Circa 1945 ^b	NA	Formerly used as a passenger terminal and aircraft maintenance activities. ^a 25 to 30 buildings/storage facilities located northwest of 93. ^h	Demolished (but foundation still exists) ^b
Building 94	1962 ^f	4,020 ^c	Former training facility (currently vacant). ^a Storage Area 3 on northeastern side contained maintenance related fluids (fuel, paint and solvents, etc.). ^g	Present ^g

^a Weston, 1990

^b Woodward-Clyde, 1995

^c Occusafe, 1989

^d Earth Tech, Inc., 1995

^e Earth Technology Corp., 1994

^f IT, 2001

^g Woodward Clyde Federal Services, 1996

^h IT, 1999

ⁱ Completion Report, Six Ordnance Magazines

^j Basic Layout Plan, 16 May 1945

^k Real Property Record DA Form 2877

NA not available

ENCLOSURE 4

Environmental Studies

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ENCLOSURE 5

Environmental Condition of Property (ECP) Categories

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred. (including no migration of these substances from adjacent areas)

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.

Category 6: Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.

Category 7: Areas that are not evaluated or require additional evaluation.

ENCLOSURE 6

**Notice of Hazardous Substances and Petroleum
Product Storage, Release, or Disposal**

ENCLOSURE 6-1

Notification of Petroleum Product Storage, Release, or Disposal

Site Name	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 20	Diesel fuel	Dates of storage, release, or disposal are not known. Building was constructed in 1957. UST was removed sometime prior to 1996.	A UST of unknown capacity was located on the southwest side of the building. The UST supplied diesel fuel to a generator in the building and was removed some time prior to 1996. Soil samples were collected during the RI near the former tank location. UHE, UHP and lead were detected above step-out criterion. ^a Excavation and confirmation sampling were conducted as part of the 1998 Interim Removal Actions. Approximately 150 yd ³ were removed at the former UST location. Lead was detected in the confirmation samples at baseline concentrations. ^b No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Building 26	Diesel fuel	Dates of storage, release, or disposal are not known. Building was constructed sometime prior to 1978. UST was removed sometime between 1994 and 1995. It is not known when the AST was removed.	Building 26 was a Ground Approach Radar Building. A 1,000-gallon UST, which stored diesel fuel, was located on the southern side of the building. A 150 to 300 gallon diesel fuel AST was located inside the building. These tanks supplied fuel for Building 26 activities. Potholes were excavated around the former UST location and soil samples were collected from the potholes. TPH-D was detected in the soil samples above step-out criterion. ^a No staining was identified near the former AST location, and this area was not investigated further. The risk assessment and FFS evaluations determined that TPH-D is the only contaminant remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP selected Manage In-Situ with Monitoring and Maintenance as the final remedy for this site to protect future wetland receptors from exposure to TPH-D found at concentrations above action goals. ^d
Building 35/39	Diesel fuel	Dates of storage, release, or disposal are not known. Buildings 35 and 39 were constructed prior to 1978. Two ASTs located at this site were removed in 1999.	Buildings 35 and 39 were manually operated and automatically operated pump stations, respectively. Building 35 contained former AST-6, which had a capacity of approximately 2,000 gallons and contained diesel fuel. Building 39 contained former AST-5, which had a capacity of approximately 2,000 gallons and contained diesel fuel. Investigations in 1993 indicated that soil around the ASTs contained lead and PAHs above baseline concentrations. ^b Toluene was also detected. Excavation and confirmation sampling were conducted near Building 39 in 1998. Soil borings were also drilled around Building 35. TPH-D and UHE were detected in these efforts at concentrations above interim removal action guidance levels. ^c Approximately 332 yd ³ of soil were removed from the former AST 6 area in 1999. UHE was detected in confirmation samples at concentrations above interim removal action guidance levels. ^c No contaminants related to petroleum storage, release, or disposal at this site are present at concentrations that require remedial action. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance at this site for contaminants that are not related to petroleum storage or release.

ENCLOSURE 6-1

Notification of Petroleum Product Storage, Release, or Disposal

Site Name	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 41	Diesel fuel	<p>Dates of storage, release, or disposal are not known.</p> <p>Building 41 was constructed prior to 1978. The USTs at the site were abandoned prior to 1970 and removed in 1995.</p>	<p>Building 41 was a manually operated stormwater pump station. The Building 41 Area includes two 1,100-gallon diesel fuel USTs and two diesel fuel ASTs. The USTs were removed in 1995.</p> <p>Soil samples were collected around the ASTs. The results indicated the horizontal extent of fuel contamination from the ASTs was approximately 20 feet and the vertical extent was approximately 5 feet.</p> <p>Soil borings were drilled around the former location of the USTs. Soil samples from the borings detected UHE above its step-out criterion^a and lead above its baseline concentration.^b</p> <p>Approximately 250 yd³ of soil were excavated west of Building 41 as part of the 1998 Interim Removal Actions. Additionally, approximately 450 yd³ of soil were excavated east of building 41 as part of the 1999 Interim Removal Actions. TPH concentrations exceeded the interim removal action guidance level^c in confirmation samples. PAHs were also detected.</p> <p>The risk assessment and FFS evaluations determined that THP-D and PAHs are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP selected Excavation and Offsite Disposal as the final remedy for this site to protect future wetland receptors from exposure to TPH-D and PAHs found at concentrations above action goals.^d Following completion of the FFS, remedial action, including building demolition, excavation, and confirmation sampling, has been completed. Contaminant concentrations (e.g., TPH and PAHs) were detected below action goals following the removal actions. However, because the analytical results obtained following the building demolition are currently being reviewed by the Army and regulatory agencies, this site is being evaluated as though the actions have not yet taken place.</p>

ENCLOSURE 6-1

Notification of Petroleum Product Storage, Release, or Disposal

Site Name	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 82/87/92/94 Area	Unknown petroleum (Building 82). This building was used for aircraft maintenance; petroleum storage was likely. Unleaded Gasoline (Building 87) Fuels (Building 92/94 Area)	Dates of storage, release, or disposal are not known. Building 82 was constructed in 1969 and demolished in 1998. Building 87 was constructed prior to 1997. Building 92 was constructed in 1972. Building 94 was constructed in 1962.	Soil samples from potholes at Building 82 detected UHE at concentrations that exceeded step-out criterion. ^a During 1998 interim removal actions, 170 yd ³ of soil were excavated. Confirmation soil samples detected UHP and UHE above their interim removal action guidance levels. ^c Additional excavation of 317 yd ³ was conducted in 1999. No contaminants in soil were detected above their interim removal guidance level. ^c The Army conducted an additional soil and groundwater investigation at Building 82 in September 2002 (Cerrudo Services, 2002). Soil and groundwater samples were collected inside and outside of Building 82. TPH-D, TPH-G, and TPH-MO were detected in the groundwater samples. BTEX compounds were not detected in soil or groundwater samples. The Army and SWRCB agreed that no further action is required at this site with respect to groundwater. An unknown number of 5-gallon containers were stored in a metal CONEX box northwest of the Building 87. There are no known petroleum releases from this area. Fuel was stored in Storage Area 3 located near Building 92/94. Fuel hydrocarbons were not detected in soil samples collected from this area. There are no known petroleum releases from this area. No contaminants related to petroleum storage, release, or disposal at this site are present at concentrations that require remedial action. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance at this site for contaminants that are not related to petroleum storage or release.
Building 84/90 Area	Unknown petroleum (Building 90). This building was used for aircraft maintenance; petroleum storage was likely.	Dates of storage, release, or disposal are not known. Building 90 was constructed in 1961.	There are no known releases of petroleum substances at this site. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Building 86	Unknown petroleum. Area used for aircraft maintenance activities.	Dates of storage, release, or disposal are not known. Building 86 was constructed in 1967 and was demolished in 1998	Soil borings were drilled near interior and exterior drains for Building 86. Lead was detected at concentrations both above and below its baseline concentration. ^b UHE and UHP were detected both above and below their step-out criterion. ^a During the 1998 interim removal actions, additional soil borings were drilled around the storm drain line south of the building. One sample from the borings detected PAHs above interim removal action guidance levels. ^c No contaminants related to petroleum storage, release, or disposal at this site are present at concentrations that require remedial action. The ROD/RAP selected Manage In-Situ with Monitoring and Maintenance at this site for contaminants that are not related to petroleum storage or release.

ENCLOSURE 6-1

Notification of Petroleum Product Storage, Release, or Disposal

Site Name	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
East Levee Generator Pad	Diesel fuel	Dates of storage, release, or disposal are not known.	<p>The East Levee Generator Pad is reported to have contained a 55-gallon drum and a former AST located on a concrete slab adjacent to the generator pad. Both the 55-gallon drum and the AST supplied diesel fuel to a generator at the site.</p> <p>Soil samples collected during the RI indicated UHE was detected above its step-out criterion^a and lead and PAHs were detected above their baseline concentrations.^b Excavation and confirmation sampling were performed during 1998 interim removal activities. Approximately 380 yd³ of soil were removed. Confirmation samples did not detect TPH or PAHs; lead and other metals were detected below interim removal action guidance levels.^c The excavation was backfilled.</p> <p>No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>
Revetment 18/ Building 15	Diesel fuel	Dates of storage, release, or disposal are not known.	<p>A 120-gallon AST storage tank was used to store fuel for the generator located inside Building 15. UHE contamination was detected above its step-out criterion^a in a confirmation sample near the AST. Lead was also detected in this sample above its baseline concentration.^b The AST and associated piping were removed by IT in 1997.</p> <p>An interim removal action was conducted at Building 15 in 1998. Approximately 170 yd³ of soil were removed near the former AST. Confirmation samples detected lead and UHE at concentrations below their interim removal action guidance levels.^c</p> <p>No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>
Onshore Fuel Line	Aviation gasoline, JP-4	<p>Dates of storage, release, or disposal are not known.</p> <p>The fuel lines were removed in 1995 and 1998</p>	<p>The onshore fuel line (ONSFL) was used to transport fuel from an offshore unloading terminal to the airfield hangars and fuel storage facility at POL Hill. TPH, ethylbenzene, xylenes, PAH, and lead were detected in soil samples collected following removal of the fuel lines.</p> <p>The risk assessment and FFS evaluations determined that TPH, ethylbenzene, xylenes, and PAHs are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP selected Manage In-Situ with Monitoring and Maintenance as the final remedy for this site to protect future wetland receptors from exposure to TPH and PAHs found at concentrations above action goals.^d</p>
Tarmac East of Outparcel A-5	No petroleum products were stored at this site.	<p>Dates of storage, release, or disposal are not known.</p> <p>Petroleum migration from an adjacent site impacted soil at the tarmac east of out parcel A-5.</p>	<p>Soil samples collected at the Tarmac detected TPH. Potholes were excavated during the RI. Soil samples from the potholes detected PAH below baseline concentrations,^b lead near baseline concentrations,^b and UHP below step-out criterion.^a</p> <p>No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>

ENCLOSURE 6-1

Notification of Petroleum Product Storage, Release, or Disposal

Site Name	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Revetment 5	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and VOCs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 a soil sample from beneath the pad detected UHP. A VOC, 2-butanone, was detected at an estimated value of 4 ppb. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Revetment 8	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 a soil sample was collected from beneath the revetment. No contaminants were detected in this sample. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Revetment 14	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead. In 1999, UHE was detected in a sample collected from surface soil near the revetment. The risk assessment and FFS determined that TPH is the only contaminant at this site that could pose a potential risk to future wetland receptors. The ROD/RAP selected Manage In-Situ with Monitoring and Maintenance as the final remedy for this site to protect future wetland receptors from exposure to TPH found at concentrations above action goals. ^d
Revetment 15	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH, PAHs, and lead (at or below background concentrations). In 1999, metals (including cadmium and lead) were detected in soil samples collected from around and beneath the revetment at concentrations generally at or below background. Cadmium and lead were detected at background concentrations. A VOC, toluene, was detected at an estimated value of 6 ppb. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Revetment 17	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). Soil borings were also installed around the revetment and samples were collected at depth in 1993. TPH was detected in these samples, and lead and PAHs were detected above baseline concentrations. ^b During the RI additional soil samples were collected. These samples did not detect PAHs or lead above baseline concentrations. ^b In 1999 a soil sample was collected from beneath the revetment. No contaminants were detected in this sample. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.

ENCLOSURE 6-1

Notification of Petroleum Product Storage, Release, or Disposal

Site Name	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Revetment 20	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH, PAHs, and lead (at background concentrations). Soil borings were also installed around the revetment and samples were collected at depth in 1993. No contaminants were detected above baseline concentrations. ^b In 1999 a soil sample was collected from beneath the revetment. No contaminants were detected in this sample. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Revetment 22	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999, UHE, metals, and PAHs were detected in soil samples. The risk assessment and FFS determined that TPH and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP selected Manage In-Situ with Monitoring and Maintenance as the final remedy for this site to protect future wetland receptors from exposure to TPH and PAHs found at concentrations above action goals. ^d These institutional controls are currently in place therefore remedial actions are complete.
Revetment 24	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 a soil sample from beneath the pad detected UHE and PAH. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Revetment 27	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, a VOC, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993, soil samples from soil borings detected TPH, PAHs, and lead (at or below background concentrations). During the RI samples from soil borings around this revetment detected lead below baseline concentrations ^b and SVOCs. In 1999 a soil sample was collected from beneath the revetment. No contaminants were detected in this sample except for the VOC, butanone, at an estimated concentration of 2 ppb. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.
Revetment 28	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). During the RI additional soil samples were collected. These samples detected UHE at 22 ppm. No contaminants are present at levels that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.

Notes:

- ^a **Step-out Criterion**—a level of contaminant concentration established during the RI to determine when stepping out or additional excavation was required for evaluating TPH contamination.
- ^b **Baseline Concentration** —the cumulative concentration of an analyte present in soil due to both natural occurrence and anthropogenic activities that are unrelated to activities conducted at a site. Used throughout the RI to represent background concentrations for metals and PAHs.
- ^c **Interim Removal Action Guidance Levels or Guidance Levels**—concentrations of specific contaminants used to establish excavation limits during interim removal actions. These levels were recommended by regulatory agencies and resource trustees. These levels were not used as final clean up goals.

Environmental Action Contaminant Concentration Goals (Action Goals)—The action goals are based primarily on site-specific ambient concentrations, in combination with RWQCB-developed numbers for San Francisco Bay ambient sediments and NOAA effects-range low (ER-L) sediment concentrations as defined in the ROD/RAP.

AST	aboveground storage tank
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylene
PAH	polynuclear aromatic hydrocarbons
ppb	parts per billion
ppm	parts per million
SVOC	semivolatile organic compound
TPH	total petroleum hydrocarbons
TPH-D	total petroleum hydrocarbons—diesel
TPH-G	total petroleum hydrocarbons—gasoline
TPH-MO	total petroleum hydrocarbons—motor oils
UHE	unknown extractable hydrocarbons
UHP	unknown purgeable hydrocarbons
UST	underground storage tank
VOC	volatile organic compound
yd ³	cubic yards

ENCLOSURE 6-2

Notification of Hazardous Substance Storage, Release, and Disposal

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Former Sewage Treatment Plant (including sanitary and industrial waste lines)	<p>The types of hazardous substances stored at this site are not known.</p> <p>The types of substances detected at this site include TPH, metals, DDTs, and PAHs.</p>	<p>Dates of storage, release, or disposal are not known.</p> <p>The FSTP Buildings (42, 43, 44, 45, and 45A) were constructed prior to 1978 and were demolished in 1987.</p>	<p>The FSTP consisted of five buildings, a digester, and four sludge drying beds. During the RI soil borings were drilled in and around the sludge drying beds. Soil samples from the borings detected metals, Aroclor 1254, DDT, DDE, PAHs and UHE. A pothole sample detected PAHs above baseline concentrations^b and UHE above its step-out criterion.^a</p> <p>In 1998, approximately 4,000 yd³ of soil centered along the former sludge drying beds was removed. Confirmation soil samples detected UHE, metals, and DDTs above their interim removal guidance levels.^c</p> <p>In 1999 approximately 140 yd³ of soil was excavated to address a sludge layer identified in 1998. Confirmation soil samples detected DDT, DDD, silver, mercury, and TPH-D above their interim removal guidance levels.^c</p> <p>The risk assessment and FFS evaluations determined that DDTs and PAHs are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
Building 35/39	<p>The types of hazardous substances stored at this site are not known.</p> <p>The types of substances detected at this site include DDTs.</p>	<p>Dates of storage, release, or disposal are not known.</p>	<p>Buildings 35 and 39 were manually operated and automatically operated pump stations, respectively. Features of the site included three active transformers located midway between the two buildings, outfall pipes which discharge water into the ODD, and two ASTs.</p> <p>A sediment sample collected from the Building 35 outfall in 1991 detected DDD and DDT. During interim removal activities related to the ASTs at this site, DDD, DDE, and DDT were detected in confirmation soil samples at concentrations above their interim removal action guidance levels.^c</p> <p>The risk assessment and FFS evaluations determined that DDTs are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Excavation with Offsite Disposal as the remedy for this site to protect future wetland receptors.</p>

ENCLOSURE 6-2

Notification of Hazardous Substance Storage, Release, and Disposal

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 82/87/92/94 Area (including storm drains)	PCBs (Building 82) Paint, antifreeze, cleaning compounds, and solvents (Building 87) Paint, solvents, and PCBs (Building 92/94 area)	Dates of storage, release, or disposal are not known.	<p>Building 82</p> <p>A transformer is located north east of Building 82. During the RI soil samples were collected beneath and around the transformer pad. PCBs were detected in all of the samples.</p> <p>In the 1998 interim removal actions approximately 170 yd³ of soil were removed from the transformer pad area. Confirmation soil samples detected PCBs above their interim removal action guidance levels.^c</p> <p>In the 1999 interim removal actions an additional 317 yd³ of soil were excavated. Confirmation soil samples did not detect PCBs.</p> <p>Building 87</p> <p>Building 87 was used for the storage of products, and dispensing racks located in the area surrounding the building were used to hold 55-gallon drums of solvent and cleaning compounds. In 1993, soil samples were collected from test pits and storm drain sediment. Three soil borings and a monitoring well were drilled. Soil samples detected metals above baseline concentrations.^b PAH, metals, and VOCs were detected in the sediments; the concentrations of PAH and metals were above their baseline concentrations.^b</p> <p>Building 92/94</p> <p>Three transformers were previously located on a concrete pad between Buildings 92 and 94. A former storage area was located east of Building 94 consisting of metal containers used to store maintenance-related fluids. In 1990, soil borings were drilled and soil samples were collected from two test pits. Metals were detected above baseline concentrations.^b During the RI, surface soil samples were collected around the transformer pad. PCBs were detected in all surface soil samples. Step-out samples did not detect PCBs; however, additional samples were taken from these potholes to address a green-stained rocky fill. No compounds were detected above their baseline concentrations.^b</p> <p>In 1998, the transformer pad and switches were removed and approximately 125 yd³ of soil were excavated in the transformer pad area. PCBs were not detected above their guidance level.^c</p> <p>The risk assessment and FFS evaluations determined that metals (barium and beryllium) are the only constituents present at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>

ENCLOSURE 6-2

Notification of Hazardous Substance Storage, Release, and Disposal

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 84/90 Area	Paint and cleaning compounds	Dates of storage, release, or disposal are not known.	<p>No remedial action is needed at this site.</p> <p>Three transformers were previously located on a concrete pad northeast of Building 84. Building 90 consisted of two wash racks at the west side of the building, a small sump on the southern side of the building, and a former concrete transformer pad on the southern side of the building where three transformers were previously located. During the RI, one surface sample was collected on the north side of Building 84. The soil sample detected metals and PAHs above their baseline concentrations.^b Four surface soil samples were also collected at the former location of the transformer pad. No PCBs were detected in the soil samples.</p> <p>Five soil borings were drilled around Building 90. Soil samples detected metals above their baseline concentrations.^b Four surface soil samples were also collected at the former Building 90 transformer pad. No PCBs were detected at the former transformer pad. Remediation activities were not performed at Building 84/90.</p> <p>No contaminants related to hazardous substances storage, release, or disposal at this site are present at concentrations that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 86 (including storm drains)	Solvents, paints, waste oils, and waste fuels	Dates of storage, release, or disposal are not known.	<p>Building 86 contained a flammable materials locker and at least one recirculating solvent parts cleaner. Other features of the site included a former transformer located at the southern corner of the Building 86 pad; Storage Area 1 located at the northeaster corner of the building, which was used for drum storage; and Storage Area 2 located at the southwestern corner of the building, where waste material from activities at Building 86 were taken and stored in drums and small containers.</p> <p>Previous investigations indicated the presence of PAHs and metals above baseline concentrations^b in sediment samples collected from five storm drains located west and northeast of Building 86. During the RI, soil borings were collected from an area adjacent to the storm drains inside Building 86, an exterior boring was made along the drain located southeast of the building, soil samples were collected from the western corner of the building and from a storm drain (SD-1) located on the western side of the building, and surface soil samples were collected from beneath the concrete around the former transformer. One PAH was detected above its baseline concentration^b from samples collected along the interior and exterior drains. Lead was detected above its baseline concentration^b from samples collected from the western side of the building, along SD-1. PCBs were not detected at the transformer pad.</p> <p>In 1998, a storm drain investigation was conducted at Building 86. Soil borings were drilled along SD-1 to the south of the building. Soil samples detected metals above baseline concentrations^b and PAHs were detected at concentrations above their guidance level.^c</p> <p>The risk assessment and FFS evaluations determined that metals and PAHs are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors from exposure to metals and PAHs found at concentrations above action goals.^d</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Perimeter Drainage Ditch	<p>No hazardous substances were stored at this site.</p> <p>The types of substances detected at this site include DDTs and metals.</p>	Dates of release or disposal are not known.	<p>The entire PDD is approximately 17,500 feet long and conveys surface water runoff to the pump stations located on the eastern levee for lifting and discharge into the outboard drainage ditch and San Pablo Bay. One section of the PDD extends from the new storm water pump station near the New Hamilton Partnership levee around the eastern portion of the inboard area to a confluence with the 54-inch storm drain line. This segment is concrete-lined and is approximately 13,500 feet in length. The other portion of the PDD, north of the confluence with the 54-inch storm drain line, is unlined and is approximately 4,000 feet long.</p> <p>In 1996, 34 sediment samples were collected from the lined portion of the PDD. Sediment samples detected metals, PAHs, and DDT (and its breakdown products DDE and DDD). During the RI, the unlined portion of the PDD was investigated. Two sediment samples were collected, one in the northeast corner of the Inboard Area (to evaluate the potential impact from a suspected PCB spill) and the second along the southern section of the PDD near the GSA Sale Area boundary. No PCBs were detected. Metals were also detected in the sediment samples above their baseline concentrations.^b</p> <p>1998 Interim Removal Actions consisted of dewatering and sediment removal from the PDD (lined and unlined portions). Confirmation samples were collected in the unlined portion of the ditch. Confirmation soil samples detected nickel, DDE, and DDT above their guidance levels.^c DDD was also detected in several confirmation samples.</p> <p>During the remedial design investigation, two surface soil samples were collected from cracks located on the northeastern side of the concrete-lined PDD in the pump station area. Surface soil samples from the cracks detected DDTs, herbicides, metals, and PAHs.</p> <p>During removal actions in 2001/2002, the soil banks above the concrete lining of the PDD within the area of the future proposed Hamilton Wetland Restoration Project wetland channel was excavated and disposed of offsite. This action was taken to alleviate any potential concern of historical deposits from the PDD.</p> <p>The risk assessment and FFS evaluations determined that beryllium and DDTs are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Excavation with Offsite Disposal as the remedy for the northern end of the unlined perimeter drainage ditch to protect future wetland receptors. The ROD/RAP recommends Excavation with Offsite Disposal as the remedy for the lined perimeter drainage ditch within the proposed channel cut area to protect future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for the lined perimeter drainage ditch outside of the proposed channel cut area to protect future wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
PDD Spoil Pile A	No hazardous substances were stored at this site. The types of substances detected at this site include metals and DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected metals (zinc and beryllium) and total DDTs.</p> <p>The risk assessment and FFS evaluations determined that beryllium, zinc, DDE, and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
PDD Spoil Pile B	No hazardous substances were stored at this site. The types of substances detected at this site include metals and DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected DDE, DDT, lead, mercury, and silver above their guidance levels.^c During the 1999 Interim Removal Actions, approximately 591 yd³ of soil were removed. Confirmation sampling detected mercury, silver, lead, DDT, DDE, and DDD below their guidance levels.^c</p> <p>The risk assessment and FFS evaluations determined that cadmium, copper, mercury, silver, zinc and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
PDD Spoil Pile C	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected DDE above its guidance level.^c During the 1999 Interim Removal Actions, approximately 17 yd³ of soil were removed. Confirmation sampling detected pesticides (DDD, DDE, and DDT) below their guidance levels.^c</p> <p>The risk assessment and FFS evaluations determined that DDE and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors from exposure to DDE and DDT found at concentrations above action goals.^d</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
PDD Spoil Pile D	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected total DDT and DDE.</p> <p>The risk assessment and FFS evaluations determined that DDE and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors from exposure to DDE and DDT found at concentrations above action goals.^d</p>
PDD Spoil Pile E	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	<p>Remedial actions at this site are complete.</p> <p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected DDE above its guidance level.^c During the 1999 Interim Removal Actions, two separate excavations were conducted and approximately 261 yd³ of soil were removed. Confirmation sampling detected DDE and DDT below their guidance levels.^c</p> <p>No contaminants related to hazardous substances storage, release, or disposal at this site are present at concentrations that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>
PDD Spoil Pile F	No hazardous substances were stored at this site. The types of substances detected at this site include metals, PAHs, and DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>In 1995, soil samples were collected from the spoils piles. Soil samples detected metals and PAH contamination. Approximately 18,125 square feet of soil will be removed to a depth of 1 foot from areas around each of the pile locations. Samples will be collected to determine if contamination is present.</p> <p>The risk assessment and FFS evaluations determined that metals, PAHs, and DDTs are the only contaminants remaining at this site that could pose a potential risk to humans from marsh recreation and future wetland receptors. The Army conducted excavation and confirmation sampling in January 2002 and, based on the analytical results, have determined further sampling is needed. The ROD/RAP recommends excavation with offsite disposal as the remedy for this site to protect future wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
PDD Spoil Pile G	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected total DDT and DDE.</p> <p>The risk assessment and FFS evaluations determined that DDE and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
PDD Spoil Pile H	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	<p>Remedial actions at this site are complete.</p> <p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected UHE, DDT, and DDE above their guidance levels.^c During the 1999 Interim Removal Actions, approximately 290 yd³ of soil were removed. Confirmation sampling detected UHE, DDT, and DDE below their guidance levels.^c</p> <p>No contaminants related to hazardous substances storage, release, or disposal at this site are present at concentrations that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>
PDD Spoil Pile I	No hazardous substances were stored at this site. The types of substances detected at this site include metals and DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected UHE and DDT above their guidance levels.^c During the 1999 Interim Removal Actions, approximately 70 yd³ of soil were removed. Confirmation sampling resulted in no detections of the chemicals identified in the 1998 Interim Removal Actions.</p> <p>The risk assessment and FFS evaluations determined that beryllium and pesticides (DDD and DDT) are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
PDD Spoil Pile J	No hazardous substances were stored at this site. The types of substances detected at this site include PAHs and DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected benzo(a)pyrene, benzo(a)anthracene, DDE, and DDT above their guidance levels.^c During the 1999 Interim Removal Actions, approximately 13 yd³ of soil were removed. Confirmation sampling detected DDD, DDE, and PAHs below their guidance levels.^c DDT was detected above its guidance level.^c</p> <p>The risk assessment and FFS evaluations determined that DDD, DDE, and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
PDD Spoil Pile K	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected total DDT and DDE.</p> <p>The risk assessment and FFS evaluations determined that DDE and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
PDD Spoil Pile L	No hazardous substances were stored at this site. The types of substances detected at this site include metals and DDTs.	Dates of release or disposal are not known.	<p>During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations.</p> <p>During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected nickel above its guidance level.^c During the 1999 Interim Removal Actions, approximately 6 yd³ of soil were removed. Confirmation sampling detected nickel below its guidance level.^c</p> <p>The risk assessment and FFS evaluations determined that barium, cobalt, lead, zinc, and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
PDD Spoil Pile M	No hazardous substances were stored at this site. The types of substances detected at this site include DDTs.	Dates of release or disposal are not known.	During the course of military operations at the airfield, the PDD was periodically dredged to remove vegetative matter and sediment. The dredged material was stockpiled onbase in 13 separate locations. During the 1998 Interim Removal Actions, soil was removed from the footprint of the pile down to the approximate original grade. Confirmation sampling detected total DDT. The risk assessment and FFS evaluations determined that DDE and DDT are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Northwest Runway Area	The Northwest Runway was used for aircraft activities. The types of hazardous substances detected at this site include metals and PAHs.	Dates of release or disposal are not known.	This site was originally identified as an area of potential concern because of geophysical survey anomalies that suggested buried objects might be present. Soil investigations did not encounter debris that would indicate any landfill activity. Investigations began at this site in 1985. Soil samples were collected and detected metals below baseline concentrations, ^b DDD, TPH, and bis(2-ethylhexyl)phthalate (a common laboratory contaminant). In 1997, four direct-push soil samples were collected. Metals (beryllium and boron) were detected above background concentrations. The risk assessment and FFS evaluations determined that metals, beryllium, and boron are the only contaminants remaining at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 1	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 soil samples detected metals including barium, cadmium, and lead. UHE, UHP, and PAHs were also detected. The risk assessment and FFS evaluations determined that barium, cadmium, lead, and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 2	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 soil samples detected metals including cadmium and lead. UHE and PAHs were also detected. The risk assessment and FFS evaluations determined that cadmium, lead, and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Revetment 3	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 a soil sample detected TPH and lead (at or below background concentrations). In 1999 a soil sample detected metals including barium, copper, and manganese. UHP was also detected. The risk assessment and FFS evaluations determined that barium, copper, and manganese are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 4	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 soil samples detected metals (including cadmium and lead), UHP, and PAHs. The risk assessment and FFS evaluations determined that cadmium, lead, and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 6	Revetment 6 was used as an engine test pad and for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected toluene and lead below its baseline concentration. ^b In 1999 soil samples were collected from around the revetment and beneath the revetment. The surface soil samples detected dioxins, metals, PAH, UHE, and UHP. The risk assessment and FFS evaluations determined that TPH-G and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The Army conducted excavation and confirmation sampling in January 2002 and, based on the analytical results, have determined further sampling is needed. The ROD/RAP recommends Excavation with Offsite Disposal as the remedy for this site to protect future wetland receptors.
Revetment 7	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH, PAHs, and lead (at or below background concentrations). In 1999 soil samples were collected from around the revetment and beneath the revetment detected UHE, UHP, metals, and PAH. The risk assessment and FFS evaluations determined that TPH and lead are the only contaminants at this site that could pose a potential risk to future wetland receptors. The Army conducted excavation and confirmation sampling in January 2002 and, based on the analytical results, have determined further sampling is needed. The ROD/RAP recommends Excavation with Offsite Disposal as the remedy for this site to protect future wetland receptors.

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Revetment 9	<p>The revetment area was used for aircraft staging and maintenance.</p> <p>The types of hazardous substances detected at this site include metals and PAHs.</p>	<p>Dates of storage, release, or disposal are not known.</p> <p>The revetment area has been out of service since 1974.</p>	<p>Remedial actions at this site are complete.</p> <p>In 1996 soil samples detected metals above baseline concentrations.^b Acenaphthene was also detected. During the 1999 RI approximately 144 yd³ of soil were excavated. Confirmation soil samples did not detect lead above its interim removal action guidance level.^c</p> <p>No contaminants related to hazardous substances storage, release, or disposal at this site are present at concentrations that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>
Revetment 10	<p>This revetment was used as a test burn pit for fire fighter training from 1975 to 1987. The revetment area was also used for aircraft staging and maintenance.</p> <p>The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.</p>	<p>Dates of storage, release, or disposal are not known.</p> <p>The revetment area has been out of service since 1987.</p>	<p>Remedial actions at this site are complete.</p> <p>In 1987, soil samples at Revetment 10 detected seven metals above their baseline concentrations^b and TPH. In 1993 additional sampling detected lead and PAHs above baseline concentrations.^b</p> <p>Approximately 2,427 yd³ of soil were excavated during 1998 interim removal actions. Confirmation soil samples detected UHE above its interim removal guidance level.^c The area was excavated further and confirmation samples did not detect UHE. Nickel was also detected above its interim removal guidance level^c and the area was further excavated. Confirmation samples did not detect nickel above its guidance level.^c Two dioxins were detected in a shallow soil sample and this area was excavated. Three dioxins and one furan were detected in the confirmation sample from this area.</p> <p>No contaminants related to hazardous substances storage, release, or disposal at this site are present at concentrations that could pose a risk to future wetland receptors or that would require remedial action. The ROD/RAP recommends no further action for this site.</p>
Revetment 11	<p>The revetment area was used for aircraft staging and maintenance.</p> <p>The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.</p>	<p>Dates of storage, release, or disposal are not known.</p> <p>The revetment area has been out of service since 1974.</p>	<p>In 1999 soil samples detected metals (including copper) and TPH.</p> <p>The risk assessment and FFS evaluations determined that copper is the only contaminant at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>
Revetment 12	<p>The revetment area was used for aircraft staging and maintenance.</p> <p>The types of hazardous substances detected at this site include metals.</p>	<p>Dates of storage, release, or disposal are not known.</p> <p>The revetment area has been out of service since 1974.</p>	<p>In 1996 soil samples detected metals (including copper) above their baseline concentrations.^b</p> <p>The risk assessment and FFS evaluations determined that copper is the only contaminant at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Revetment 13	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at background concentrations). In 1999 soil samples collected from around the revetment and beneath the revetment detected UHE, UHP, metals (including cadmium and lead), and PAH. The risk assessment and FFS evaluations determined that PAH, cadmium, and lead are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 16	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons and metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 one soil sample was collected from beneath the revetment. This sample detected a metal, barium. The risk assessment and FFS evaluations determined that barium is the only contaminant at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 19	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, VOCs, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH, PAHs, and lead. In 1999 soil samples collected from around and beneath the revetment detected metals (including barium, copper, cadmium, and lead). UHE and UHP, TPH-D, a VOC (2-butanone at 19 ppb) and PAHs were also detected. The risk assessment and FFS evaluations determined that barium, copper, cadmium, lead, TPH, and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 21	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples detected TPH and lead (at or below background concentrations). In 1999 soil samples collected from around and beneath the revetment detected metals (including copper and vanadium). UHE, UHP, and PAHs were also detected. The risk assessment and FFS evaluations determined that barium, copper, vanadium, TPH, and PAHs are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Revetment 23	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include metals.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1996 soil samples detected metals above baseline concentrations. ^b During the 1999 RI one additional sample was collected at this revetment. Vanadium, copper, and zinc were detected above their baseline concentrations. ^b The risk assessment and FFS evaluations determined that copper is the only contaminant at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 25	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples were collected at this revetment. No contaminants were detected. In 1999 one sample was collected from beneath the revetment. UHE, PAH and metals (including barium), were detected in the sample. The risk assessment and FFS evaluations determined that barium and TPH-D are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Revetment 26	The revetment area was used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known. The revetment area has been out of service since 1974.	In 1993 soil samples from soil borings detected TPH, lead (at or below background concentrations), and one PAH. In 1999 a soil sample was collected from beneath the revetment. This sample detected metals, (including barium, boron, and manganese), UHE, and UHP. The risk assessment and FFS evaluations determined that barium, boron, manganese, and TPH are the only contaminants at this site that could pose a potential risk to future wetland receptors. The ROD/RAP recommends Manage In-Situ with Monitoring and Maintenance as the remedy for this site to protect future wetland receptors.
Former Revetments	The former revetments were used for aircraft staging and maintenance. The types of hazardous substances detected at this site include petroleum hydrocarbons, metals, and PAHs.	Dates of storage, release, or disposal are not known.	In addition to the twenty-eight revetments, the Archive Search Report identified eight former revetments in the Main Airfield Parcel. Five of these were paved over during the construction of the aircraft maintenance area, two became dirt roads, and the surrounding grass has revegetated one. These eight former revetments have not been investigated.

ENCLOSURE 6-2

Notification of Hazardous Substance Storage, Release, and Disposal

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
High Marsh (Nonchannel Cut) (Channel Cut)	No hazardous substances were stored in this area.	Dates of release or disposal are not known.	<p>Nonchannel Cut</p> <p>Samples were collected in the High Marsh by ESI in 1993, USACE in 1994, WCFS in 1996, and IT in 1999. These samples detected metals at concentrations slightly above background.</p> <p>In December 2001 and January 2002, the Army collected soil and sediment samples from portions of the Nonchannel Cut Area. The objective of the sampling was to characterize copper and manganese contamination at a location on the northern end of the High Marsh, to characterize the extent of metals contamination (particularly lead) at a cluster of locations on the northern end of the High Marsh, and to characterize the extent of manganese contamination in the central portion of the High Marsh sufficient to determine the appropriate remedy. Sampling at the High Marsh Nonchannel Cut Area resulted in detections of metals and DDTs. The ROD/RAP recommends excavation and offsite disposal as the remedy for this site to protect wetland receptors.</p> <p>Channel Cut</p> <p>Samples were collected in the High Marsh by ESI in 1993, USACE in 1994, and WCFS in 1996. In 1993, metals were detected above baseline concentration.^b In 1994, studies detected metals, TRPH, and TPH-D above baseline concentrations^b in the pump station outfall area within the channel cut area of the High Marsh. Additionally, PAHs were detected above baseline concentrations^b at three sites within the channel cut area. In 1996, metals were detected at all sampled locations within the channel cut area of the High Marsh. PAHs were detected at one location, and two pesticides (chlordane and DDT) were detected above baseline concentrations^b at one location within the channel cut area.</p> <p>In September 2001, the Army conducted a specific investigation to evaluate the soil within the Proposed Channel Cut Area. Samples were collected at twelve locations and three depths (1, 2, and 4 feet bgs). The samples were collected in a grid from the ODD toward the bay where the planned channel cut is anticipated. TPH, metals, PAHs, and SVOCs were detected in samples collected from the Proposed Channel Cut Area. The ROD/RAP recommends Excavation and Offsite Disposal as the remedy for this site to protect wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Antenna Debris Disposal Area	<p>No hazardous substances were stored in this area.</p> <p>Visual inspections of the piles indicates the piles contain discarded materials from the former antenna facilities and building materials.</p>	Dates of release or disposal are not known.	<p>The Antenna Debris Disposal Area consists of two piles, one located east of the ODD and one to the west of the ODD. Both piles are currently covered with a growth of native grasses (not pickleweed common to the rest of the marsh).</p> <p>The western Antenna Debris pile was investigated by WCFS in 1995, IT in 1998, and FW in 1999. During these investigations, soil samples were collected in and near the western pile. The results of these investigations indicate that lead and DDTs are common throughout the western pile. Only one of the samples was analyzed for PCBs and PCBs were detected in the sample.</p> <p>In December 2001 and January 2002, the Army collected soil samples from the eastern area and additional samples from the western area. The objective of the sampling was to investigate the extent of chemicals detected in the previous investigations at the western area and to characterize the eastern area sufficient to determine the appropriate remedy. Sampling at the eastern and western areas resulted in detections of metals, DDTs, TPH, and PCBs. The ROD/RAP recommends Excavation and Offsite Disposal as the remedy for this site to protect wetland receptors.</p>
Outboard Drainage Ditch (Historical ODD)	No hazardous substances were stored in this area.	Dates of release or disposal are not known.	<p>The ODD was investigated by ESI in 1993, USACE in 1994, WCFS in 1996, and IT in 1998. TPH, metals, PCBs, and DDTs have been detected in sediment samples collected from the ODD.</p> <p>In January 2002, the Army collected sediment samples from the ODD. The objective of the sampling was to investigate the extent of chemicals detected in the previous investigations at the outfalls, to address the downstream extent of contamination from the outfalls, and to characterize the portion of the ODD upstream of the outfalls sufficient to determine the appropriate remedy. Sampling at the ODD resulted in detections of metals, TPH, and DDTs. The ROD/RAP recommends Excavation and Offsite Disposal as the remedy for this site to protect wetland receptors.</p> <p>The Historic ODD was investigated by the Army in December 2001. During the investigation, the Army collected soil and sediment samples at 250-foot intervals along the Historic ODD in order to characterize the extent of contamination. Some metals and DDTs were detected. The ROD/RAP recommends Excavation and Offsite Disposal as the remedy for this site to protect wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Boat Dock (Nonchannel Area) (Channel Area)	No hazardous substances were stored in this area.	Dates of release or disposal are not known.	<p>The Boat Dock had electrical power supplied by two transformers and one or more small enclosed structures. The two transformers were located on a concrete pad inside a fenced enclosure adjacent to the boat launch. A gasoline-powered winch was used to lower the launch down a steel track into the dredged channel. The Boat Dock is constructed of creosote-treated timbers, and PAHs are present in the sediments.</p> <p>IT investigated the transformer pad in 1997 and conducted interim removal actions in 1998. The 1997 IT investigation detected PCBs in a soil sample collected at the northeast corner of the transformer pad. In 1998 IT removed the transformer pad and excavated approximately 24 yd³ of soil. After completion of confirmation sampling, soil from an onsite borrow area was used to backfill the excavation. Confirmation samples were collected from the excavation. There were no PCB detections in the confirmation samples.</p> <p>The former Boat Dock structure was investigated by Foster Wheeler in 1999 as part of the Remedial Design Investigation. Samples were collected around and beneath the deck structures. Metals and DDTs were detected in samples collected during this investigation. PAHs were also detected but are likely attributable to the creosote in the pier pilings.</p> <p>During the investigations noted above, a sediment sample was collected in 2000 by Foster Wheeler from the Boat Dock channel. The sample contained DDTs, herbicides, PAHs, TPH, VOCs, and metals. Due to the significant amount of sedimentation in the channel area, it is not clear if the sample is indicative of historical conditions or possible impacts from the Boat Dock area.</p> <p>In December 2001, the Army collected additional sediment samples from the Channel Area. The objective of the sampling was to determine the extent of contamination found at the Boat Dock sufficient to determine the appropriate remedy. Sampling at the Channel Area indicated the presence of metals. The ROD/RAP recommends Excavation and Offsite Disposal as the remedy for this site to protect wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
East Levee Construction Debris Disposal Area	No hazardous substances were stored in this area.	Dates of release or disposal are not known.	<p>Samples were collected from throughout the ELCDDA by WCC in 1987, ESI in 1993, USACE and WCC in 1994, WCFS 1996, and IT in 1999. Only a portion of the samples collected in these investigations were collected on the portion of the ELCDDA within the Main BRAC Property.</p> <p>Trench HT-13 dug by Woodward-Clyde in 1986 was located in the ELCDDA area located on the Main BRAC property. The trench sample contained metals at concentrations below background.</p> <p>One soil sample collected by ESI in 1990 was located within the ELCDDA on the property line between the Main BRAC Property and the land owned by the SLC. This sample detected metals (including beryllium, chromium, lead, and vanadium) at levels slightly above background.</p> <p>The ROD/RAP recommends excavation and offsite disposal as the remedy for this site to protect wetland receptors .</p>
Area 14	No hazardous substances were stored at this site.	Dates of release or disposal are not known.	<p>Area 14 was investigated by the Army in December 2001 and January 2002. During the investigation, the Army collected soil and sediment samples from Area 14 on a 100-foot grid. The objective of the sampling was to characterize the portions of Area 14 that were not covered with the construction of the runway overrun. Sampling at Area 14 resulted in detections of metals, DDTs, TPH, and PAHs. No debris or rubble, other than rock and gravel used to support the runway extension and the road, was encountered. The ROD/RAP recommends Excavation and Offsite Disposal as the remedy for this site to protect wetland receptors.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Testing Range	No hazardous substances were stored at this site.	Dates of release or disposal are not known.	<p>The Archive Search Report identified an area labeled as the "Testing Area" based on an aerial photograph dated August 1946. The area is described as a "rectangle approximately 1,000 feet by 100 feet between the sewage treatment plant and the black powder magazine." The Archive Search Report did not explain the basis for labeling the area as a "testing area"; however, the Army BRAC office has historical maps dated 16 May 1945 and 4 December 1952 that outline an area approximately 940 feet by 100 feet labeled "testing range." Neither the BRAC office nor the Archive Search Report team was able to locate accounts on how the site was used. Because Hamilton was not a research and development base, it is not likely that testing of weapons occurred here. Based on the survey of additional maps dated 25 February 1959, 15 December 1963, and 22 November 1963 that depict a portion of the testing range called a "firing range," the Army BRAC office concludes that the "testing range" may have been a small-arms target practice area.</p> <p>Because information and data available for this site is still undergoing review, decisions regarding the need for remedial action and the evaluation of alternatives for this site have not been made. However, the Army, DTSC, and the RWQCB agreed to complete the study/investigation activities listed in the ROD/RAP in accordance with the schedule also provided in the ROD/RAP. Should remedial action be required at the Archive Search Report sites, the action goals included in the ROD/RAP would apply, and the RWQCB site cleanup requirements will identify the procedure for completion of remedial activities.</p>
Northwest Alleged Disposal Area	Potential storage of hazardous substances.	Dates of release or disposal are not known.	<p>In December of 2000, a local resident and former military facility inspector stated that during a routine inspection of Hamilton in the mid-1980s, he was told various chemicals were improperly disposed of in an area near the north end of the runway (the alleged HTRW Disposal site). Previous sampling in the area included the collection and analysis of three samples within the area in question. Additionally, one boring conducted by URS Group for USACE San Francisco District in 2001–2002 was located within the boundaries of the alleged disposal area. No contamination or debris was reported from this work. The Army will conduct sampling in the area, and a Sampling and Analysis Plan is currently in review. For the purposes of future investigations, this area is being referred to as the Northwest Alleged Disposal Area. Because information and data available for this site is still undergoing review, decisions regarding the need for remedial action and the evaluation of alternatives for this site have not been made. However, the Army, DTSC, and the RWQCB agreed to complete the study/investigation activities listed in the ROD/RAP in accordance with the schedule also provided in the ROD/RAP. Should remedial action be required at the Archive Search Report sites, the action goals included in the ROD/RAP would apply, and the RWQCB site cleanup requirements will identify the procedure for completion of remedial activities.</p>

ENCLOSURE 6-2**Notification of Hazardous Substance Storage, Release, and Disposal**

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Skeet Range	No hazardous substances were stored at this site.	Dates of release or disposal are not known.	<p>A skeet range was identified in the Archive Search Report as ASR Site #18. The range was situated inboard, at the corner where South Boundary Road meets East Boundary Road and west of what is now the south runway extension. It is visible on aerial photography dating up to 26 April 1943, but is not observable in photographs beginning in 1946. COCs at a skeet range are lead and other metals from shot, and PAHs associated with clay targets.</p> <p>Because information and data available for this site is still undergoing review, decisions regarding the need for remedial action and the evaluation of alternatives for this site have not been made. However, the Army, DTSC, and the RWQCB agreed to complete the study/investigation activities listed in the ROD/RAP in accordance with the schedule also provided in the ROD/RAP. Should remedial action be required at the Archive Search Report sites, the action goals included in the ROD/RAP would apply, and the RWQCB site cleanup requirements will identify the procedure for completion of remedial activities.</p>
Firing-In-Butt	No hazardous substances were stored at this site.	Dates of release or disposal are not known.	<p>A Firing-In-Butt was identified in the Archive Search Report as ASR Site #19. The Archive Search Report accurately located the historic Firing-In-Butt in the vicinity of the runway and Revetment 25. However, the Archive Search Report incorrectly shows the Butt as being closer to the firing line than photos indicate and incorrectly states the date of its removal. There were three hardstands and a "butt," which is a target surrounded by barricade material. Aircraft machine guns, on both sides of the aircraft, were fired into the earthen mound called a "butt" to check firing alignment. The hardstands with connecting road still exist and are visible in 1960s aerial imagery. The Butt was removed in its entirety in 1947, the disposition of the soil not known.</p> <p>According to the <i>Closed, Transferring, and Transferred Range and Site Inventory Report, Hamilton Army Airfield</i> (URS 2002), the site is considered to be a negligible explosives safety risk, and no explosive-related action is necessary. The report goes on to say that because the aircraft were firmly fixed, there is low probability that rounds strayed from the intended target.</p> <p>Because information and data available for this site is still undergoing review, decisions regarding the need for remedial action and the evaluation of alternatives for this site have not been made. However, the Army, DTSC, and the RWQCB agreed to complete the study/investigation activities listed in the ROD/RAP in accordance with the schedule also provided in the ROD/RAP. Should remedial action be required at the Archive Search Report sites, the action goals included in the ROD/RAP would apply, and the RWQCB site cleanup requirements will identify the procedure for completion of remedial activities.</p>

ENCLOSURE 6-2

Notification of Hazardous Substance Storage, Release, and Disposal

Site Name	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Inboard Area-Wide DDTs and PAHs	The types of hazardous substances detected at this site include DDT (and its breakdown products DDE and DDD) and PAHs.	Not known	The Army does not view the Inboard Area-Wide DDTs and PAHs adjacent to the runway as a release that is actionable under CERCLA and therefore considers the parcel to be a Category 1. DTSC does view the Inboard Area-Wide DDTs and PAHs adjacent to the runway as a CERCLA release and considers the parcel to be a Category 6. The ROD/RAP addresses this issue to everyone's satisfaction, and it is anticipated that the deferred CERCLA warranty is expected to be issued in the future for the whole Property.

Notes:

For the purpose of this FOSET, where the actual quantities of hazardous substances stored are not known, it was assumed the amounts stored were greater than the reportable quantities. The type of material stored are reported in the table below based upon the historical use of the site.)

The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1,000 kilograms or the hazardous substance's CERCLA reportable quantity (whichever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substances CERCLA reportable quantity. See 40 CFR Part 373.

- ^a **Step-out Criterion**—a level of contaminant concentration established during the RI to determine when stepping out or additional excavation was required for evaluating TPH contamination.
 - ^b **Baseline Concentration**—the cumulative concentration of an analyte present in soil due to both natural occurrence and anthropogenic activities that are unrelated to activities conducted at a site. Used throughout the RI to represent background concentrations for metals and PAHs.
 - ^c **Interim Removal Action Guidance Levels or Guidance Levels**—concentrations of specific contaminants used to establish excavation limits during interim removal actions. These levels were recommended by regulatory agencies and resource trustees. These levels were not used as final clean up goals.
- Environmental Action Contaminant Concentration Goals (Action Goals)**—The action goals are based primarily on site-specific ambient concentrations, in combination with RWQCB-developed numbers for San Francisco Bay Ambient sediments and NOAA effects-range low (ER-L) sediment concentrations as defined in the ROD/RAP.

bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylene
COC	chemical of concern
PAH	polynuclear aromatic hydrocarbons
PCB	polychlorinated biphenyls
ppb	parts per billion
ppm	parts per million
SVOC	semivolatile organic compound
TPH	total petroleum hydrocarbons
TPH-D	total petroleum hydrocarbons—diesel
TPH-G	total petroleum hydrocarbons—gasoline
TRPH	Total recoverable petroleum hydrocarbons
UHE	unknown extractable hydrocarbons
UHP	unknown purgeable hydrocarbons
VOC	volatile organic compound
yd ³	cubic yards

ENCLOSURE 7

Environmental Response Obligation Addendum

INTRODUCTION

This addendum identifies the assurances required to be included in the deed or contract as indicated for the approximately 630 acres to be transferred to the Conservancy and the 14 acres being transferred to the City of Novato. The following conditions, restrictions, and notifications will be placed in the deed to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities at Hamilton Army Airfield.

INCLUSION OF ENVIRONMENTAL RESPONSE OBLIGATION ADDENDUM

The Grantee, its successors, and assigns, will neither transfer the Property, lease the Property, nor grant any possessory interest, privilege, or license whatsoever in connection with the Property without the inclusion of the Environmental Response Obligation Addendum contained herein, and shall require the inclusion of the Environmental Response Obligation Addendum in all further deeds, transfers, leases, or grant of any interest, privilege, or license.

DEED ASSURANCES

Environmental documents were evaluated to identify environmental factors which may warrant constraints on certain activities in order to ensure that human health and the environment are protected. Such constraints are generally embodied as restrictions in the Deed or as specific notifications in the Deed or other documents supporting the transaction.

The deed for this transfer will include a clause that requires the Conservancy to develop a design for the wetland that incorporates the performance criteria specified in the Record of Decision/Remedial Action Plan for the Main Airfield. The design shall incorporate the performance criteria to assure that the wetland design is protective of future receptors that may inhabit the site.

CERCLA NOTICE AND COVENANT

All response actions necessary to protect human health and the environment will be the responsibility of the Grantor, with respect to any hazardous substance remaining on the Property as a result of storage, release, or disposal prior to the date of conveyance.

The Grantor covenants that when all response actions to protect human health and the environment with respect to any hazardous substance remaining on the Property on the date of transfer have been taken, the Grantor shall execute and deliver to the Grantee an appropriate document containing a warranty that all such response actions have been taken. The making of the warranty shall be considered to satisfy the requirements of CERCLA §120(h)(3)(a)(ii)(I).

The Grantor covenants that any additional remedial action found to be necessary after the delivery of the above warranty with respect to any hazardous substances remaining on the Property shall be conducted by the United States. This covenant shall not apply in any case in which the person or entity to whom the Property is transferred is a potentially responsible party under CERCLA with respect to the Property.

NOTICE OF SUITABILITY OF USE AND COVENANT

The Property is suitable only for the intended use as open space for wetland reestablishment. The deed for this transfer will include a clause that requires the Conservancy to develop a design for the wetland restoration project that meets the performance criteria specified in the Record of Decision/Remedial Action Plan for the Inboard Area Sites to assure that the wetland design is protective of future receptors that may inhabit the site.

The Army has undertaken environmental study of the Property and concluded, with the Conservancy's concurrence, that the highest and best use of the Property is limited, as a result of its environmental condition, to open space for wetland reestablishment. To protect human health and the environment and further common environmental objectives and land use plans of the Army and Conservancy, covenants and restrictions will be included to ensure that the use of the Property is consistent with the remedy for the Property. These following restrictions and covenants benefit the public welfare generally and are consistent with state and federal environmental statutes.

RESTRICTED TO NON-RESIDENTIAL USE

The Conservancy covenants for itself, its successors, and assigns not to use the Property for residential purposes, since the Property is currently being remediated for open space for wetland reestablishment. The Conservancy, for itself, its successors, or assigns covenants that it will not undertake nor allow any activity on or use of the Property that would violate the restrictions contained here. These restrictions and covenants are binding on the Conservancy, its successors, and assigns; will run with the land; and are forever enforceable. Nothing contained here will preclude the Conservancy from undertaking, in accordance with applicable laws and regulations and without any cost to the Army, any additional remediation necessary to allow for residential use of the Property. Upon completion of any remediation required to allow residential use of the Property and upon the Conservancy's obtaining the approval of the State, the Army, and if required, any other regulatory agency, the Army agrees, without cost to the Army, to release or, if appropriate, modify this restriction by recordation of an amendment hereto.

NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

a. The Conservancy is hereby informed and does acknowledge that non-friable and friable asbestos or asbestos containing material (ACM) have been removed from the Property with the exception of the asbestos pipe covering remaining on a small segment of outfall pipes that have been left in place within the levee at Buildings 35 and 39.

b. The Conservancy covenants and agrees that its use and occupancy of the Property will be in compliance with all applicable laws relating to asbestos and that the Army assumes no liability for any future remediation of asbestos or damages for personal injury, illness, disability, or death, to the Conservancy, its successors, or assigns or to any other person, including members of the general public arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos or ACM on the Property, whether the Conservancy, its successors, or assigns have properly warned or failed to properly warn the individual(s) injured. The Conservancy agrees to be responsible for any future remediation of the asbestos pipe covering. The Army assumes no liability for damages for personal injury, illness, disability, death, or Property damage arising

from the Conservancy's remediation of the pipe covering including: (1) any exposure or failure by the Conservancy to comply with any legal requirements applicable to the asbestos pipe covering following the Army's conveyance of such portion of the Property to the Conservancy pursuant to this deed, or (2) any disposal of any asbestos or ACM by the Conservancy following the Army's conveyance of the Property.

c. Unprotected or unregulated exposures to asbestos in product manufacturing, shipyard, and building construction workplaces have been associated with asbestos-related diseases. Both Occupational Safety and Health Administration (OSHA) and the USEPA regulate asbestos because of the potential hazards associated with exposure to airborne asbestos fibers. Both OSHA and USEPA have determined that such exposure increases the risk of asbestos-related diseases, which include certain cancers and can result in disability or death.

d. The Conservancy acknowledges that it has had the opportunity to inspect the Property as to its asbestos content and condition and any related hazardous or environmental conditions prior to accepting the responsibilities imposed upon the Conservancy under this section. No warranties, either express or implied, are given with regard to the condition of the Property, including, without limitation, whether the Property does or does not contain asbestos or is or is not safe for a particular purpose. The failure of the Conservancy to inspect; or be fully informed concerning the asbestos condition of all or any portion of Property offered will not constitute grounds for any claim or demand against the Government or any adjustment under this deed.

e. The Conservancy further agrees to indemnify and hold harmless the Army, its officers, agents, and employees from and against all suits, claims, demands, or actions; liabilities; judgments; costs; and attorneys' fees arising out of, or in any manner predicated on, exposure to asbestos on any portion of the Property after conveyance of the Property, to the Conservancy or any future need for remediation or abatement of asbestos. The Conservancy's obligation will apply whenever the Government incurs costs or liabilities for actions, giving rise to liability under this section.

NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT

a. The Conservancy is hereby informed and does acknowledge that all buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain LBP. The Property does not contain any buildings used or intended to be used as residential real property. All LBP that poses a risk to human health will be addressed by the Conservancy. The ROD/RAP specifies how the Hamilton Wetlands Restoration Program will address possible lead contamination from paint used on the buildings.

LBP, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built prior to 1978 is notified that such property may present exposure to lead from LBP that may place young children at risk of developing lead poisoning. Lead poisoning in young children may produce permanent neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems, and impaired memory. Lead poisoning also poses a particular risk to pregnant women. The seller of any interest in Residential Real Property is required to provide the buyer with any information on LBP hazards from risk assessments or inspections in the seller's possession and notify the buyer of any known LBP hazards.

“Residential Real Property” means dwelling units, common areas, building exterior surfaces, and any surrounding land including outbuildings, fences, and play equipment affixed to the land available for use by residents but not including land used for agricultural, commercial, industrial, or other non-residential purposes, and not including paint on the pavement of parking lots, garages, or roadways and buildings visited regularly by the same child, 6 years of age or under, on at least 2 different days within any week, including day-care centers, preschools, and kindergarten classrooms.

b. Available information concerning known LBP and/or LBP hazards, the location of LBP and/or LBP hazards, and the condition of painted surfaces have been provided to the Conservancy. All purchasers must receive the federally approved pamphlet on lead poisoning prevention. The Conservancy acknowledges receipt of all of the information described in this subparagraph.

c. The Conservancy covenants and agrees that it will not permit the occupancy or use of any buildings or structures on the Property as Residential Real Property as defined in paragraph a. The Conservancy covenants and agrees to be responsible for any abatement or remediation of LBP or LBP hazards on the Property necessary as a result of the subsequent use of the Property for open space for wetland reestablishment. The Conservancy covenants and agrees to comply with solid or hazardous waste laws that may apply to any waste that may be generated during the course of LBP abatement activities.

d. The Army and the Conservancy have entered into a separate Memorandum of Agreement which includes LBP issues, and the Conservancy further agrees to indemnify and hold harmless the Army, its officers, agents, and employees from and against all suits, claims, demands, or actions; liabilities; judgments; and costs, and attorney's fees arising out of, or in a manner predicated on personal injury, death, or property damage resulting from, related to, caused by, or arising out of LBP or LBP hazards on the Property.

e. The covenants, restrictions, and requirements of this Section shall be binding upon the Conservancy, its successors, assigns, and all future owners and will run with the land. The Conservancy on behalf of itself, its successors, and assigns, covenants that it will include and make legally binding, this Section, in all subsequent transfers, leases, or conveyance documents.

NOTICE OF HAZARDOUS SUBSTANCE STORAGE, RELEASE, OR DISPOSAL

The Army hereby notifies the Conservancy of the former storage, release, or disposal of hazardous substances on the Property. A summary of the areas the storage, release disposal of hazardous substance is known to have occurred is provided in **Enclosure 6**. For some areas, remediation or mitigation of releases has been conducted. These actions are also summarized in **Enclosure 6**. This notice is given pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section (§)120(h)(1) and (3).

NOTICE OF USE, DISPOSAL, AND POTENTIAL FOR THE PRESENCE OF ORDNANCE AND EXPLOSIVES

The Archive Search Report identified Ordnance and Explosives (OE) related features including an aircraft harmonization range, a skeet range, black powder and demolition bombs storage magazines, firing-in-butt, and a “testing” range (which included a firing range). Of these

features, only the demolition bombs storage magazine was identified and is a potential source of OE contamination because of possible disposal of unserviceable bombs by burial. The demolition bombs storage magazine was demolished and the area was paved over during the extension of the runway circa 1953. The harmonization range was subsequently identified as an aircraft avionics shop. The other range facilities would have employed small arms, which would not pose an explosive hazard. In conducting the archives search and the site inspection, no indications or evidence of OE contamination was found at these facilities. The ROD/RAP proposes future investigations to address potential releases of contamination at the Skeet Range, Firing-In-Butt, and the Testing Range.

Notwithstanding the records search conducted by the Army, the parties acknowledge that, because this is a former military installation with a history of ordnance and explosives use, there is a potential for unexploded ordnance to be present on the Property. In the event that the Conservancy, its successors, and assigns, should discover any ordnance on the Property, it shall not attempt to remove or destroy it, but shall immediately notify the local police department and the Army, or the designated explosive ordnance personnel, whom will be dispatched promptly to dispose of such ordnance at no expense to the Conservancy. Future Health and Safety plans for intrusive construction activities will include proper ordnance and explosives safety precautions and points of contact as are standard with construction activities at former military bases. One other requirement is that a Soil Management Plan be submitted before intrusive activities occur on the Property. This plan will be used to provide oversight over intrusive activities in potential ordnance and explosives areas.

NOTICE OF THE PRESENCE OF RESIDUAL POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs) AND INBOARD AREA-WIDE DDTs

Several additional issues related to DDTs (DDT and its breakdown products DDE and DDD) and PAH contamination have been identified within the Inboard Area of the Main Airfield Parcel. These issues include PAHs in soil near the runway and residual Inboard Area-Wide DDTs. The Army has identified these issues as not being CERCLA releases and therefore did not address them in the comprehensive remedial investigation, interim removal actions, human health and ecological risk assessment, or the Focused Feasibility Study for the Inboard Area Sites. The Army agreed with regulatory agencies to address these issues in the ROD/RAP for the Main Airfield Parcel.

GRANTOR RESERVATION OF ACCESS

The Army reserves a right of access to any and all portions of the Property for environmental investigation remediation or other corrective action. This reservation includes the right of access to and use of, to the extent permitted by law, available utilities at reasonable cost to the Army. These rights shall be exercisable in any case in which a remedial action, response action or corrective action is found to be necessary after the date of conveyance of the Property, or such access is necessary to carry out a remedial action, response action or corrective action on adjoining property. Pursuant to this reservation, the Army and its officers, agents, employees, contractors, subcontractors, and the State shall have the right (upon reasonable notice to the Conservancy, or the then owner and any authorized occupant of the Property) to enter upon the herein described tracts of land and conduct investigations and surveys, to include drillings, test-pitting, borings, data and/or record compilation, and other activities related to environmental investigation, and to carry out remedial or removal actions as required or necessary under

applicable authorities, including but not limited to monitoring wells, pumping wells, and treatment. The Conservancy agrees that notwithstanding any other provisions of the Deed, the Army assumes no liability to the Conservancy, the then owner, or any other person, should the grantor's exercise of its rights hereunder interfere with the Conservancy's use of the Property.

PROJECTED SCHEDULE FOR REMEDIAL ACTION

The RWQCB, as authorized by the Porter Cologne Water Quality Control Act, will adopt site cleanup requirements that will ensure implementation of the final approved ROD/RAP requirements. Through these Site Cleanup Requirements, the RWQCB will ensure that agreed-upon environmental assurance actions are taken to address residual concentrations of Inboard Area-Wide DDTs and PAHs in soils adjacent to the runway through the imposition of Waste Discharge Requirements governing the implementation of the Hamilton Wetland Restoration Project.

The Army shall ensure that the Hamilton Wetland Restoration Project, including implementation of its plan for monitoring and adaptive management, will achieve and maintain the performance criteria throughout the life of the wetland at each site where it is applied. The duration of the Hamilton Wetland Restoration Project obligation shall extend to a date 13 years following the date of levee breach and reintroduction of tidal influence to the Inboard Area. Throughout the period of implementation of the Hamilton Wetland Restoration Project and after, the Army and the property owner shall ensure that the remedy for these sites is maintained to the extent necessary to protect human health and the environment (i.e., 5-year reviews).

Activities in the coastal salt marsh will be conducted in a manner that is sensitive to impacts to plants and animals. The excavated areas in the coastal salt marsh will be backfilled with either clean onsite soil or rehandled dredged material of similar physical characteristics, except in the area proposed as a channel cut by the Hamilton Wetland Restoration Project. A Soils Management Plan will be submitted to support the oversight of these intrusive activities.

Several areas of the HAAF property are still under investigation to determine the final activities necessary for protection of the wetlands reuse. The BRAC and GSA soil stockpiles that were generated from previous excavation activities are currently located on paved surfaces. These areas include the following sites identified in the Archive Search Report:

- Testing Range (ASR Site #4)
- Alleged HTRW Disposal Site (ASR Site #8)
- Skeet Range (ASR Site #18)
- Firing-In-Butt (ASR Site #19)

The RWQCB, through its Site Cleanup Requirements, will detail the process for further investigation and remediation (if needed) of these areas. If remediation is required, the action goals established in this ROD/RAP will apply. All required Army activities must be completed according to a schedule that does not interfere with the progress of the Hamilton Wetland Restoration Project.

A schedule for the activities described above is provided in Enclosure 9.

DEFERRED WARRANTY

Upon State concurrence with the Army's determination that all response action necessary to protect human health and the environment with respect to any substance remaining on the property on the date of transfer has been taken, the Army shall execute and deliver to the transferee an appropriate document containing a warranty that all such response action has been taken, and the making of the warranty shall be considered to satisfy the requirement of CERCLA §120(h)(3)(A)(ii)(I). This warranty shall be in a form that is recordable in the Office of the Recorder, Marin County, California.

BUDGETING FOR RESPONSE ACTIONS

The Army has submitted and will continue to submit through its established budget channels to the Director of the Office of Management and Budget a request for funds that adequately addresses investigation and completion of all response actions required. Expenditure of any Federal funds for such investigations or response actions is subject to congressional authorization and appropriation of funds for that purpose, and nothing herein shall be interpreted to require obligations or payments by the United States in violation of the Anti-Deficiency Act. The Army will submit its funding request for the projects needed to meet the necessary response actions.

All correspondence regarding these projects will recite that these projects are being undertaken on property being transferred pursuant to CERCLA §120(h)(3)(C) and that once validated, approved, and funded, the funding may not be withdrawn without the consent of the Assistant Secretary of the Army for Installations and Environment.

**Note: This summary will be included
in a subsequent draft.**

ENCLOSURE 8

Response to Comments Summary

ENCLOSURE 9

Approximate Schedule of Cleanup Activities for Hamilton

ENCLOSURE 9**Approximate Schedule of Cleanup Activities For Hamilton**

Activity	Anticipated Time of Activity^a
Site Cleanup Requirements	August 2003
Property Transfer	September 2003
Soils Management Plan	September 2004
65 Percent Design for Wetlands (will include where and how the 3 feet of stable cover will be achieved for the site)	September 2004
Waste Discharge Requirements	February 2005
Design for BRAC Inboard Area Activities (sampling)	December 2003
Excavation Inboard Area (as needed)	To Be Determined
Design for Outboard Area Activities (excavation/confirmation sampling)	August 2004
Excavation Outboard Area	February 2005
ASR Sites Investigation	December 2003
ASR Sites Remediation (if necessary)	To Be Determined
Implementation of Wetland Restoration Project	September 2005
Breach of Levee (completion of all the ROD/RAP requirements, except monitoring)	^b
Monitoring for Determination of Operating Properly and Successfully, Monitoring by Civil Works/Property Owner Starting After Breach	September 2026
5-Year Reviews (starting after the remedy has been determined operating properly and successfully)	Every 5 Years

^a These dates are anticipated dates based on the current project understanding and are presented for planning purposes. The dates do not constitute obligations or deadlines and will be further refined through the adoption of the Site Cleanup Requirements.

^b Levee breach is currently expected to occur 8 years after commencement of the wetland restoration project implementation as long as the requirements of the ROD/RAP are met.